Message

From: Dixon Monty USGR [monty.dixon@syngenta.com]
Sent: 11/7/2019 2:34:29 PM
To: Mannix, Marianne [Mannix.Marianne@epa.gov]
CC: Schmid, Emily [Schmid.Emily@epa.gov]
Subject: RE: Gramoxone SL 2.0 - Phase III Label and counter cards
Attachments: 000100-01431.20190329E.GRAMOXONE_SL_2.0-AMEND-MAR2019-CL.PDF; 000100-01431.20190329E.GRAMOXONE_SL_2.0-AMEND-MAR2019-HI.PDF

Flag: Follow up

Hi Marianne,

Please find the updated Gramoxone SL 2.0 (EPA Reg. No. 100-1431) human health mitigation Phase III labels. These are intended to supersede the pending versions of the phase III label sent on 9/16/2019. The attached clean and highlighted labels update the counter card PPE language as summarized below. Please note we have also changed references to closed system package "*For containers less than or equal to 120 gallons*" in the use and information section (label page 10) and storage and disposal section (label page 91) to read "*For containers less than 120 gallons*" in accordance with the volume requirements specified for closed systems in the human health mitigation decision. No other changes have been made from the versions of the phase III label sent on 9/16.

Thanks and please let me know if you have any questions or need any additional information from my end.

With my best regards,
Monty

From: Dixon Monty USGR
Sent: Thursday, November 7, 2019 8:30 AM
To: Marianne A. Mannix (Mannix.Marianne@epa.gov) <mannix.marianne@epa.gov>; Sell, Nathan <Sell.Nathan@epa.gov>
Cc: Schmid, Emily <Schmid.Emily@epa.gov>; Sherman, Kelly (Sherman.Kelly@epa.gov) <sherman.kelly@epa.gov>
Subject: Gramoxone SL 2.0 - Phase III Label and counter cards

Hello Marianne and Nathan,

Thank you for our previous opportunity to meet related to the upcoming November 14, 2019 Phase II paraquat label switchover date, we appreciate your willingness to meet on such short notice. As agreed, we are proceeding with the requirement that bulk products repackaged after November 14. 2019 will use the phase II label for Gramoxone SL 2.0. Please recall that during our meeting, we indicated that the counter card stamped with the phase II label included an outdate reference to the respirator PPE which needed to be amended to reflect the current respirator language requirements. This was corrected by amendment for the phase II label (as summarized below) was approved Nov 4, 2019 label amendment.

Counter Card	Previous Statement	New Statement (note matches label)
English language	*Dust/Mist NIOSH-approved respirator with any N, R, P, or HE filter*	*NIOSH-approved particulate respirator with any N, R, or P filter, NIOSH approval number prefix TC-84A, or a NIOSH-approved powered air-purifying respirator with an HE filter with NIOSH approval number prefix TC-21C.*"

Spanish language	*un respirador aprobado por NIOSH para polvo/niebla con cualquier filtro N, R, P o HE*	*un respiradorde partículas aprobado por NIOSH para polvo/niebla con cualquier filtro N, R o P, prefijo de número de aprobación NIOSH TC-84A, o un respirador purificador de aire con aprobación NIOSH con filtro HE con prefijo de número de aprobación NIOSH TC-21C*

In addition to this phase II label, we have been working with you on the Gramoxone SL 2.0 phase III labels which I believe are close to being approved for all registrants. This pending label action also has the previous language in the counter card. While we are proceeding with our transition to the Gramoxone SL 3.0 product which will be distributed in accordance the human health mitigation phase III requirements including the closed system, I believe it is still important to update the pending phase III label to prevent confusion by having the counter card for the phase III being stamped with different reference to the respirator than what was just approved on Nov 4, 2019. Accordingly, I am instructing our label team to make the same change to counter card for the pending Phase III label and I will send it to you in the next day or so.

Thanks and with my best regards,

Monty

[Master]

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RESTRICTED USE PESTICIDE
DUE TO ACUTE TOXICITY
FOR RETAIL SALE TO AND USE ONLY BY CERTIFIED APPLICATORS ONLY– **NOT TO BE USED BY UNCERTIFIED PERSONS WORKING UNDER THE SUPERVISION OF A CERTIFIED APPLICATOR.**

Gramoxone® SL 2.0

PARAQUAT DICHLORIDE	GROUP 22 HERBICIDE

Herbicide

A Weed, Grass, and Harvest Aid Desiccant/Defoliant Herbicide

Active Ingredient:	
Paraquat dichloride (1,1'-dimethyl-4,4'-bipyridinium dichloride)	30.1%
Other Ingredients:	69.9%
Total:	100.0%

Gramoxone SL 2.0 contains 2.0 pounds paraquat cation per gallon as 2.762 pounds paraquat dichloride per gallon.
Gramoxone SL 2.0 contains alerting agent (odor), emetic, and dye.

EPA Reg. No. 100-1431
EPA Est.

KEEP OUT OF REACH OF CHILDREN / MANTENER FUERA DEL ALCANCE DE LOS NIÑOS.

DANGER / POISON
PELIGRO / VENENO

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

• **CORROSIVE TO SKIN AND EYES.**	• **CORROSIVO PARA LA PIEL Y LOS**

• **NEVER TRANSFER THIS PRODUCT INTO FOOD OR BEVERAGE CONTAINERS OR CONTAINERS NOT EXPLICITLY INTENDED FOR PESTICIDES.** • **READ ENTIRE LABEL PRIOR TO USING THIS PRODUCT.** • **IN THE CASE OF AN ACCIDENT, SEEK IMMEDIATE MEDICAL ATTENTION. SYMPTOMS ARE PROLONGED, PAINFUL, AND CAN BE FATAL.**	**OJOS.** • **NUNCA TRANSFIERA ESTE PRODUCTO A RECIPIENTES PARA COMIDA O DE BEBIDAS O RECIPIENTES NO EXPLÍCITAMENTE PREVISTOS PARA PLAGUICIDAS.** • **LEA LA ETIQUETA COMPLETA ANTES DE USAR ESTE PRODUCTO.** • **EN CASO DE ACCIDENTE, BUSQUE ATENCIÓN MÉDICA INMEDIATA. LOS SÍNTOMAS SON PROLONGADOS, DOLOROSOS Y PUEDEN SER MORTALES.**

_____ gallons
Net Contents
[Batch Code: _____] [*For nonrefillables only.*]

FIRST AID **Contains Paraquat, a Bipyridylium Herbicide**	
If swallowed	• **SPEED IS ESSENTIAL. Immediate medical attention is required.** If available, give an adsorbent such as activated charcoal, bentonite or Fuller's Earth. • Call a poison control center or doctor immediately for treatment advice. • Do not give anything by mouth to an unconscious person.
If inhaled	• Move person to fresh air. • The odor of this product is from the alerting agent, which has been added, not from the paraquat. • If person is not breathing, call 911 or an ambulance. • Call a poison control center or doctor for further treatment advice.
If in eyes	• Hold eye open and rinse slowly and gently with clean water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
If on skin or clothing	• Take off contaminated clothing. • IMMEDIATELY wash the affected area with soap and water and rinse for 15-20 minutes. Prolonged contact will cause severe irritation. Contact with irritated skin or a cut or repeated contact with intact skin may result in poisoning. • GET MEDICAL ATTENTION. Call a poison control center or doctor for treatment advice.

NOTE TO PHYSICIAN

Refer to the booklet 'Paraquat Poisoning. A Practical Guide to Diagnosis, First Aid and Hospital Treatment' (http://www4.syngenta.com/what-we-do/crops-and-products/paraquat-safety). Administer either activated charcoal (100g for adults or 2g/kg body weight in children) or Fuller's Earth (15% solution; 1 liter for adults or 15ml/kg body weight in children). NOTE: The use of gastric lavage without administration of an adsorbent has not shown any clinical benefit. Do not use supplemental oxygen. Eye splashes from concentrated material should be treated by an eye specialist after initial treatment. With the possibility of late onset corneal ulceration, it is advised that patients with paraquat eye injuries are reviewed by an eye specialist the day after first presentation. Use treatment that is appropriate for chemical burns. Intact skin is an effective barrier to paraquat, however contact with irritated or cut skin or repeated contact with intact skin may result in poisoning.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

HOT LINE NUMBER

For 24-Hour Medical Emergency Assistance (Human or Animal)
Or Chemical Emergency Assistance (Spill, Leak, Fire or Accident)
Call
1-800-888-8372

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ATTENTION	ATENCIÓN
• DANGER – FATAL IF SWALLOWED OR INHALED. • CAUSES SEVERE EYE INJURY. • CORROSIVE TO SKIN. • NEVER TRANSFER THIS PRODUCT INTO FOOD OR BEVERAGE CONTAINERS OR CONTAINERS NOT EXPLICITLY INTENDED FOR PESTICIDES. • STORE TIGHTLY CLOSED IN ORIGINAL CONTAINER, AND IN A LOCKED PLACE AWAY FROM CHILDREN AND ANIMALS. • NEVER USE THIS PRODUCT IN RESIDENTIAL OR PUBLIC RECREATIONAL SETTINGS (E.G., HOMES, HOME GARDENS, SCHOOLS, RECREATIONAL PARKS, GOLF COURSES, AND/OR PLAYGROUNDS). • THIS PRODUCT IS TOXIC! AN ALERTING AGENT (ODOR) HAS BEEN ADDED TO HELP PREVENT ACCIDENTAL INGESTION. • SEE BACK OF PRODUCT CONTAINER FOR IMPORTANT SAFETY INFORMATION.	• PELIGRO: MORTAL SI SE INGIERE O INHALA. • CAUSA LESIONES GRAVES EN LOS OJOS. • CORROSIVO PARA LA PIEL. • NUNCA TRANSFIERA ESTE PRODUCTO A RECIPIENTES PARA COMIDA O DE BEBIDAS O RECIPIENTES NO EXPLÍCITAMENTE PREVISTOS PARA PLAGUICIDAS. • GUARDE BIEN CERRADO EN EL ENVASE ORIGINAL Y EN UN LUGAR CERRADO LEJOS DE NIÑOS Y ANIMALES. • NUNCA USE ESTE PRODUCTO EN ÁREAS RESIDENCIALES O PÚBLICAS (COMO HOGARES, JARDINES, ESCUELAS, PARQUES RECREATIVOS, CAMPOS DE GOLF O SALONES DE JUEGOS). • ¡ESTE PRODUCTO ES TÓXICO! SE HA AGREGADO UN AGENTE DE ALERTA (OLOR) PARA AYUDAR A PREVENIR SU INGESTIÓN ACCIDENTAL. • LA PARTE POSTERIOR DEL ENVASE DEL PRODUCTO TIENE INFORMACIÓN DE SEGURIDAD IMPORTANTE.

CERTIFIED APPLICATOR TRAINING

Applicators must complete an EPA-approved paraquat training listed on the following website **https://www.epa.gov/pesticide-worker-safety/paraquat-dichloride-training-certified-applicators**. The training must be completed a minimum of every three years.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER / POISON

PELIGRO / VENENO

May be fatal if swallowed. Fatal if inhaled. Do not breathe spray mist. Causes substantial but temporary eye injury. Harmful if absorbed through skin. Do not get in eyes, on skin, or on clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before wearing again.

IMPORTANT: Inhalation is an unlikely route of exposure due to low vapor pressure and large spray droplet size, but mucosal irritation or nose bleeds may occur. Prolonged contact with this concentrated product can irritate your skin.

Personal Protective Equipment (PPE)
Applicators and other handlers (other than Mixers and Loaders) must wear:

- Long-sleeve shirt and long pants
- Shoes plus socks
- Protective eyewear
- Chemical-resistant gloves made of: barrier laminate, butyl rubber ≥ 14 mils, nitrile rubber ≥ 14 mils, neoprene rubber ≥ 14 mils , natural rubber ≥ 14 mils, polyethylene, polyvinyl chloride (PVC) ≥ 14 mils, or Viton® ≥ 14 mils
- NIOSH-approved particulate respirator with any N, R, or P filter, NIOSH approval number prefix TC-84A, or a NIOSH-approved powered air-purifying respirator with an HE filter with NIOSH approval number prefix TC-21C.

Mixers and Loaders must wear:

- Long-sleeve shirt and long pants
- Shoes plus socks
- NIOSH-approved particulate respirator with any N, R, or P filter, NIOSH approval number prefix TC-84A, or a NIOSH-approved powered air-purifying respirator with an HE filter with NIOSH approval number prefix TC-21C.
- Chemical-resistant gloves made of: barrier laminate, butyl rubber ≥ 14 mils, nitrile rubber ≥ 14 mils, neoprene rubber ≥ 14 mils, natural rubber ≥ 14 mils, polyethylene, polyvinyl chloride (PVC) ≥ 14 mils, or Viton ≥ 14 mils
- Chemical-resistant apron
- Face shield

User Safety Requirements

Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them. Follow the manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry.

Engineering Controls

When handlers use closed systems, enclosed cabs, or aircraft in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240(d)(4-6)], the handler PPE requirements may be reduced or modified as specified in the WPS.

User Safety Recommendations
Users should:

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove clothing/PPE immediately if pesticide gets inside. Then wash the affected area thoroughly and put on clean clothing.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

Environmental Hazards

Wildlife: This product is toxic to wildlife. Do not apply directly to water or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when cleaning equipment or disposing of equipment washwaters or rinsate.

Drift: Gramoxone SL 2.0 is a contact herbicide that desiccates all green plant tissue. Paraquat dichloride is a nonselective herbicide and will cause damage to nontarget crops and plants if off-target movement occurs. Extreme care must be taken to ensure that off-target drift is minimized to the greatest extent possible. Do not apply under conditions involving possible drift to food, forage, or other plantings that might be damaged or the crops thereof rendered unfit for sale, use, or consumption. Do not apply when weather conditions favor drift from treated areas. To avoid drift, do not make aerial applications during periods of thermal inversion. Refer to the local state laws, regulations, guidelines and spray drift information contained in the Directions for Use section for proper application to avoid off-target movement.

Physical and Chemical Hazards

This product is mildly corrosive to aluminum and produces hydrogen gas which may form a highly combustible gas mixture. Do not mix or store in containers, spray tanks, nurse tanks, or such systems made of aluminum or having aluminum fittings. This product is compatible with high density polyethylene and rubber lined steel containers. Do not mix or allow coming into contact with oxidizing agents. Hazardous chemical reaction may occur.

CONDITIONS OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

NOTICE: Read the entire Directions for Use and Conditions of Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

The Directions for Use of this product must be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as manner of use or application, weather or crop conditions, presence of other materials or other influencing factors in the use of the product, which are beyond the control of SYNGENTA CROP PROTECTION, LLC or Seller. To the extent permitted by applicable law, Buyer and User agree to hold SYNGENTA and Seller harmless for any claims relating to such factors.

SYNGENTA warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions under normal use conditions. To the extent permitted by applicable law: (1) this warranty does not extend to the use of the product contrary to label instructions or under conditions not reasonably foreseeable to or beyond the control of Seller or SYNGENTA, and, (2) Buyer and User assume the risk of any such use. TO THE EXTENT PERMITTED BY APPLICABLE LAW, SYNGENTA MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS WARRANTED BY THIS LABEL.

To the extent permitted by applicable law, in no event shall SYNGENTA be liable for any incidental, consequential or special damages resulting from the use or handling of this product. **TO THE EXTENT PERMITTED BY APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF SYNGENTA AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE**

RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF SYNGENTA OR SELLER, THE REPLACEMENT OF THE PRODUCT.

SYNGENTA and Seller offer this product, and Buyer and User accept it, subject to the foregoing Conditions of Sale and Limitation of Warranty and Liability, which may not be modified except by written agreement signed by a duly authorized representative of SYNGENTA.

DIRECTIONS FOR USE
RESTRICTED USE PESTICIDE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

NEVER USE THIS PRODUCT IN RESIDENTIAL OR PUBLIC RECREATIONAL SETTINGS (E.G., HOMES, HOME GARDENS, SCHOOLS, RECREATIONAL PARKS, GOLF COURSES, AND/OR PLAYGROUNDS).

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE) and restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

For Chemical Fallow, Early Postemergence Broadcast in Peanuts and Dormant Season Applications, and "Between Cutting" Applications in Alfalfa: Do not enter or allow worker entry into treated areas during the restricted-entry interval (REI) of 12 hours.

For Harvest Aid and Desiccation Applications, Preplant or Preemergence (Broadcast or Banded), and Postemergence Directed Spray: Do not enter or allow worker entry into treated areas during the restricted-entry interval (REI) of 24 hours.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water, is:

- Coveralls
- Shoes plus socks
- Protective eyewear
- Chemical-resistant gloves made of: barrier laminate, butyl rubber ≥ 14 mils, nitrile rubber ≥ 14 mils, neoprene rubber ≥ 14 mils, natural rubber ≥ 14 mils, polyethylene, polyvinyl chloride (PVC) ≥ 14 mils, or Viton ≥ 14 mils

NON-AGRICULTURAL USE REQUIREMENTS

The requirements in this box apply to uses of this product that are NOT within the scope of the Worker Protection Standard for agricultural pesticides (40 CFR Part 170). The WPS applies when this product is used to produce agricultural plants on farms, forests, nurseries, or greenhouses.

DO NOT enter or allow others to enter the treated area until sprays have dried. **AVOID** working in spray mist.

KEEP all unprotected persons out of operating areas or vicinity where there may be danger of drift.

Certain states may require more restrictive reentry intervals; consult your State Department of Agriculture for further information.

USE INSTRUCTIONS AND INFORMATION

For containers less than 120 gallons
This product must only be removed from the original container with a closed transfer system. Any subsequent transfer of this product must utilize a closed transfer system. Any attempt to circumvent the closed transfer system prior to complete removal of the product and rinsing of the product container as described in the Storage and Disposal Section of this label is prohibited.

This product may only be applied with a backpack sprayer if the backpack equipment **ONLY** allows the product to be transferred into the sprayer using a closed system.

Do not apply this product through any type of irrigation system.

When Gramoxone SL 2.0 is applied at less than 10 gallons per acre finished spray volume, a drift control or spray deposition additive **SHOULD** be used. Refer to the additive label for use directions.

Spray Drift Information

Avoiding spray drift at the application site is the responsibility of the applicator. The interaction of many equipment-and-weather-related factors determine the potential for spray drift. The applicator and the grower are responsible for considering all these factors when making decisions.

The following drift management requirements must be followed to avoid off-target drift movement from aerial applications to agricultural field crops. These requirements do not apply to forestry applications, public health uses or to applications using dry formulations.

- The distance of the outer most nozzles on the boom must not exceed ¾ the length of the wingspan or rotor.

- Nozzles must always point backward parallel with the air stream and never be pointed downwards more than 45°.

Where states have more stringent regulations, they shall be observed.

The applicator should be familiar with and take into account the information covered in the **Aerial Drift Reduction Advisory Information**.

Aerial Drift Reduction Advisory Information
(This section is advisory in nature and does not supersede the mandatory label requirements.)

Information on Droplet Size

The most effective way to reduce drift potential is to apply large droplets. The best drift management strategy is to apply the largest droplets that provide sufficient coverage and control. Applying larger droplets reduces drift potential, but will not prevent drift if applications are made improperly, or under unfavorable environmental conditions (see Wind, Temperature and Humidity, and Temperature Inversions).

Controlling Droplet Size

- **Volume** - Use high flow rate nozzles to apply the highest practical spray volume. Nozzles with higher rated flows produce larger droplets.

- **Pressure** - Do not exceed the nozzle manufacturer's recommended pressures. For many nozzle types lower pressure produces larger droplets. When higher flow rates are needed, use higher flow rate nozzles instead of increasing pressure.

- **Number of Nozzles** - Use the minimum number of nozzles that provide uniform coverage.

- **Nozzle Orientation** - Orienting nozzles so that the spray is released parallel to the airstream produces larger droplets than other orientations and is the recommended practice. Significant deflection from horizontal will reduce droplet size and increase drift potential.

- **Nozzle Type** - Use a nozzle type that is designed for the intended application. With most nozzle types, narrower spray angles produce larger droplets. Consider using low-drift nozzles. Solid stream nozzles oriented straight back produce the largest droplets and the lowest drift.

Boom Length

For some use patterns, reducing the effective boom length to less than ¾ of the wingspan or rotor length may further reduce drift without reducing swath width.

Application Height

Applications must not be made at a height greater than 10 feet above the top of the largest plants unless a greater height is required for aircraft safety. Making application at the lowest height that is safe reduces exposure of droplets to evaporation and wind.

Swath Adjustment

When applications are made with a crosswind, the swath will be displaced downwind. Therefore, on the up and downwind edges of the field, the applicator must compensate for this displacement by adjusting the path of the aircraft upwind. Swath adjustment distance should increase, with increasing drift potential (higher wind, smaller drops, etc.).

Wind

Drift potential is lowest between wind speeds of 2-10 mph. However, many factors, including droplet size and equipment type determine drift potential at any given speed. Application must be avoided below 2 mph due to variable wind direction and high inversion potential. NOTE: Local terrain can influence wind patterns. Every applicator should be familiar with local wind patterns and how they affect spray drift.

Temperature and Humidity

When making applications in low relative humidity, set up equipment to produce larger droplets to compensate for evaporation. Droplet evaporation is most severe when conditions are both hot and dry.

Temperature Inversions

Applications must not occur during a temperature inversion because drift potential is high. Temperature inversions restrict vertical air mixing, which causes small suspended droplets to remain in a concentrated cloud. This cloud can move in unpredictable directions due to the light variable winds common during inversions. Temperature inversions are characterized by increasing temperatures with altitude and are common on nights with limited cloud cover and light to no wind. They begin to form as the sun sets and often continue into the morning. Their presence can be indicated by ground fog; however, if fog is not present, inversions can also be identified by the movement of smoke from a ground source or an aircraft smoke generator. Smoke that layers and moves laterally in a concentrated cloud (under low wind conditions) indicates an inversion, while smoke that move upward and rapidly dissipates indicates good vertical air mixing.

Sensitive Areas

The pesticide must only be applied when the potential for drift to adjacent sensitive areas (e.g. residential areas, bodies of water, known habitat for threatened or

endangered species, non-target crops) is minimal (i.e., when wind is blowing away from the sensitive areas).

USE INFORMATION

Gramoxone SL 2.0 is a contact herbicide used to control or suppress a broad spectrum of emerged weeds. Gramoxone SL 2.0 controls most small annual weeds – both broadleaves and grasses, and suppresses perennial weeds by destroying green foliage. Gramoxone SL 2.0 can also be used as a desiccant/defoliant at harvest.

Gramoxone SL 2.0 is formulated as a liquid which contains 2 pounds of active ingredient per gallon. The formulation contains a nontoxic odor and an emetic (an agent which will induce vomiting if the product is swallowed). The odor is included in the formulation to help prevent accidental ingestion of Gramoxone SL 2.0.

Gramoxone SL 2.0 is rapidly absorbed by green plant tissue and interacts with the photosynthetic process to produce superoxides which destroy the plant cells. Gramoxone SL 2.0 requires actively growing green plant tissue to function. Thorough coverage of all green foliage is essential for effective weed control and for effective crop desiccation/defoliation. Gramoxone SL 2.0 is not as effective on drought-stressed weeds, weeds with little green foliage (i.e., mowed or cut weeds), or mature woody bark of trees and vines.

Clay and organic matter rapidly tie up Gramoxone SL 2.0. As a result, Gramoxone SL 2.0 has no residual soil activity to affect later-planted crops or later germinating weeds.

ROTATIONAL CROPS

All rotational crops may be planted immediately after the last application of Gramoxone SL 2.0.

RAINFASTNESS

Because Gramoxone SL 2.0 is rapidly absorbed by the weed foliage, rain occurring 15-30 minutes or more after application will have no effect on the activity of Gramoxone SL 2.0.

APPLICATION

Since Gramoxone SL 2.0 is a contact-type herbicide, it is essential to obtain complete coverage of target weeds to get good control. Improper application technique and/or application to large, stressed, or mown weeds will usually result in unacceptable weed control and unacceptable crop desiccation/defoliation. Complete coverage is also essential for good crop desiccation/defoliation. See details below for specific application instructions.

USE OF A NONIONIC SURFACTANT OR CROP OIL CONCENTRATE/METHYLATED SEED OIL

Always add one of the following (failure to use one of the following at recommended rates will result in reduced performance of Gramoxone SL 2.0).

Nonionic Surfactant: For ground and aerial application, add nonionic surfactant containing 80% or more surface-active agent at a minimum of 0.25% v/v (2 pt/100 gal) of the finished spray volume.

Crop Oil Concentrate: Add a nonphytotoxic crop oil concentrate or methylated seed oil containing 15-20% approved emulsifier, at 1.0% v/v (1 gal/100 gal) of the finished spray volume for ground applications. For aerial applications, add 1 pint of crop oil concentrate per acre. Do not use crop oil concentrate when using Gramoxone SL 2.0 for cotton harvest aid.

Use an adjuvant that meets the requirements of the Chemical Producers and Distributors Association (CPDA) adjuvant certification program.

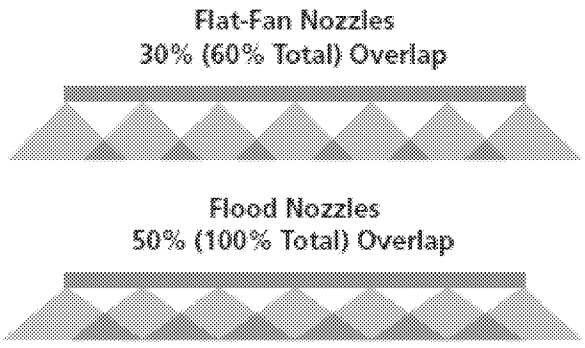
NOZZLE SELECTION

The use of flat-fan nozzles will result in the most effective application of Gramoxone SL 2.0. Flood nozzles are generally not as good as flat fans since they produce large uneven droplets. The use of flood nozzles may result in reduced weed control due to inadequate coverage.

WHEN SPRAYING LESS THAN 20 GALLONS OF SPRAY CARRIER PER ACRE, USE ONLY FLAT FAN NOZZLES AS RECOMMENDED IN THE CHART BELOW.

Table 1. Nozzles, Pressures and Setup.

	Nozzle Type	
	Flat Fan	**Flood**
Maximum Size	8	15
Spray Pressure (at nozzle)	30-50 psi	30-50 psi
Maximum Nozzle Spacing	30"	40"
Direction of Spray Pattern	Down	Down
Maximum Speed	10 mph	10 mph
Spray Overlap (at each edge)	30%	50%



Using nozzles, pressures, or setups different from the above chart will result in reduced control.

SPRAY CARRIER

Always use clean water (free of mud or clay), clear liquid nitrogen, or complete clear liquid fertilizers as the carrier when spraying Gramoxone SL 2.0. Muddy water, or suspension-type fertilizers containing clay, can inactivate Gramoxone SL 2.0. Never use suspension-type fertilizers containing clay as the spray carrier. If using a complete clear liquid fertilizer containing high phosphate levels as the spray carrier, always use the higher rate of Gramoxone SL 2.0 and surfactant.

Note: When using liquid fertilizers such as 28% N as a spray carrier, it is important that nonionic surfactant still be used with Gramoxone SL 2.0. Liquid fertilizer carriers cannot substitute for surfactant.

RATES OF GRAMOXONE SL 2.0

Follow rates listed with each use of Gramoxone SL 2.0. Use the higher label rates when weeds are dense or large. Also, use higher label rates for harvest aid when crop vegetation is dense. For broadcast applications of Gramoxone SL 2.0 with backpack sprayers, the application rate must not exceed 0.50 lb ai/A (one quart) in a minimum of 30 gallons of spray solution per acre. This product may only be applied with a backpack sprayer if the backpack equipment **ONLY** allows the product to be transferred into the sprayer using a closed system as specified in the USE INSTRUCTIONS AND INFORMATION section of this label.

SPRAY VOLUME

Follow minimum spray volumes listed with each use of Gramoxone SL 2.0. These are **minimum** volumes only, and spray volumes should be increased as necessary to obtain complete coverage of the target weed or plant without runoff from the foliage.

WHEN SPRAYING LESS THAN 20 GALLONS OF SPRAY CARRIER PER ACRE, TARGET WEEDS SHOULD NOT EXCEED 6 INCHES IN HEIGHT.

APPLICATION TIMING

Gramoxone SL 2.0 should be applied to emerged weeds when they are small. Weeds 1-6 inches in height are the easiest to control. Larger weeds may be more difficult to control. When weeds have been grazed or mowed, thus removing much of the green foliage, allow the weeds to regrow to a height of 2-4 inches before spraying if possible. Similarly, when forage or grain crops have been harvested prior to spraying, weeds present in the field will also have been cut. To allow for adequate green foliage to remain on weeds in this situation, raise cutter bars as high as possible from the ground to cut stubble and weeds at a greater height.

BURNDOWN OF GRASS COVER CROPS OR VOLUNTEER CEREALS

When using Gramoxone SL 2.0 for control of grass cover crops or volunteer cereals, best results are obtained when Gramoxone SL 2.0 is applied **prior to tillering** or **after boot stage**. This is especially important with a wheat cover crop or volunteer wheat. Treatments made between tillering and boot stage will generally not provide complete control. Do not expect complete control of perennial cover crops.

ENVIRONMENTAL CONDITIONS

Gramoxone SL 2.0 is active over a wide range of environmental conditions. Cool weather (below 55°F) will slow the activity of Gramoxone SL 2.0, as will cloudy, overcast weather, but will not affect performance.

SPOT SPRAYING

When only small areas are to be sprayed with labeled applications, it is advantageous to mix small quantities of Gramoxone SL 2.0. To aid in mixing small quantities, the following table should be consulted.

If The Broadcast Rate Per Acre for Gramoxone SL 2.0 is:	Add The Following Amount of Gramoxone SL 2.0 To 1 Gallon of Water
1.5 pt	⅓ (0.33) fl oz
2 pt	⅜ (0.375) fl oz
2.5 pt	½ (0.5) fl oz
3 pt	⅔ (0.67)fl oz

Always add ⅓-½ fl oz of a nonionic surfactant for each gallon of spray. When spot spraying in this manner, spray to thoroughly wet the foliage, but not to the point of runoff.

TANK MIXING FOR IMPROVED BURNDOWN OF DIFFICULT WEEDS AND RESIDUAL WEED CONTROL

Tank mix compatibility testing (a.k.a., jar testing) is prohibited. Consult http://www.syngenta-us.com/herbicides/gramoxone-sl-2.0 for a list of compatible tank mix products.

Photosynthetic Inhibitor Herbicides

Difficult weeds can often be controlled by tank mixing Gramoxone SL 2.0 with other herbicides. The addition of herbicides which are also photosynthetic inhibitors (PSI) (Herbicide Mode of Action Groups 5 & 7) will slow the activity of Gramoxone SL 2.0, allowing Gramoxone SL 2.0 to thoroughly distribute itself within the treated leaf. The resulting level of control is usually greater than if Gramoxone SL 2.0 was applied alone.

It is the pesticide user's responsibility to ensure that all products are registered for the intended use. Read and follow the applicable restrictions and limitations and directions for use on all product labels involved in tank mixing. Users must follow the most restrictive directions for use and precautionary statements of each product in the tank mixture.

Improved Weed Control with Photosynthetic Inhibitor Herbicides

Control of difficult weeds listed below and annual grass control will be enhanced by the addition of a photosynthetic inhibitor herbicide (Herbicide Mode of Action Group 5 & 7). For best results a second application is needed.

Barnyardgrass
Broadleaf signalgrass
Cheatgrass
Cocklebur
Fall Panicum
Giant Ragweed
Knotweed
Kochia
Lambsquarters
Malva (Cheeseweed)
Horseweed (Marestail)
Morningglory
Pennsylvania Smartweed
Perennial Weeds (suppression only)
Prickly lettuce
Sedges
Tansymustard
Velvetleaf
Volunteer wheat
Spiderwort

Improved Control of Perennial and Annual Broadleaf Weeds

When perennial broadleaf weeds such as Canada thistle, bindweed, dandelion, etc. or difficult to control annual broadleaf weeds such as giant ragweed or morningglory are present, tank mixes with 2,4-D ester (Low Volatile), 2,4-DB, Clarity®, Banvel®, or

Flexstar® where labeled, will help improve control. Tank mixing the amine formulation of 2,4-D with Gramoxone SL 2.0 may result in reduced grass control.

Order of Tank Mixing

In general, Gramoxone SL 2.0 tank mixes with other products should be mixed as follows:

1. Fill spray tank ½ full with clean water or other approved carriers such as clear liquid fertilizer.
2. Add nonionic surfactant to tank
3. Begin tank agitation and continue throughout mixing and spraying.
4. Add dry formulations (WP, DF, etc.) to tank.
5. Add liquid formulations (SC, EC, L, etc.) to tank.
6. Add Gramoxone SL 2.0 to tank.
7. Add crop oil concentrate or methylated seed oil to tank where needed.
8. Fill remainder of spray tank.

It is the pesticide user's responsibility to ensure that all products are registered for the intended use. Read and follow the applicable restrictions and limitations and directions for use on all product labels involved in tank mixing. Users must follow the most restrictive directions for use and precautionary statements of each product in the tank mixture.

PRECAUTIONS AND RESTRICTIONS

EQUIPMENT/CONTAINER

Flush all spray equipment with water after use each day. Gramoxone SL 2.0 is corrosive to aluminum. Aluminum spray equipment and aluminum aircraft structures that are exposed to spray solution or spray drift should be flushed thoroughly with water immediately after use.

In dry areas, dust stirred up by high winds or equipment tires can coat weed or plant leaves and reduce Gramoxone SL 2.0 activity. Avoid applying Gramoxone SL 2.0 in extremely dusty conditions.

LIMITATIONS AND PRECAUTIONS

- For Cotton Harvest Aid: Do not pasture livestock in treated fields or feed treated foliage.

- **DO NOT** use this product in residential or public recreational settings (e.g. homes, home gardens, schools, recreational parks, golf courses, and/or playgrounds).

- In preplant and preemergence (to the crop) uses, do not apply to soils lacking clay minerals, e.g., peat, muck, pure sand, artificial planting media.

- Seedbeds and plantbeds should be formed as far ahead of planting and treatment as possible to permit maximum weed and grass emergence prior to treatment.

- To reduce germination of new weeds, seeding or transplanting should be done with a minimum amount of soil disturbance.

- Gramoxone SL 2.0 used for preplant weed control over the top of plastic mulch may damage transplants which come in contact with the plastic. Sufficient rainfall or sprinkler irrigation to cause wash-off prior to planting may be needed to prevent damage to the crop.

- Weeds and grasses emerging after application of Gramoxone SL 2.0 will not be controlled or suppressed.

- Unless otherwise indicated, crop plants emerged at time of application may be severely injured or killed if contacted by sprays of Gramoxone SL 2.0.

PARAQUAT-RESISTANT WEED MANAGEMENT

PARAQUAT DICHLORIDE	GROUP 22 HERBICIDE

Some naturally occurring weed biotypes resistant to paraquat dichloride may exist through normal genetic variability in any weed population. The repeated use of herbicides with the same mode of action is known to lead under certain conditions to a selection of resistant weeds.

The active ingredient in Gramoxone SL 2.0 is paraquat dichloride, a mechanism of action Group 22 herbicide, which inhibits Photosystem I (PSI).

Any weed population may contain or develop plants naturally resistant to paraquat dichloride and other Group 22 herbicides. The resistant biotypes may dominate the weed population if these herbicides are used repeatedly in the same field.

Within the USA specific biotypes of a number of species, including horseweed/marestail (*Conyza canadensis*), hairy fleabane (*Conyza bonariensis*), *Italian ryegrass (Lolium perenne ssp. multiforum),* goosegrass (*Eleusine indica), dotted duckweed (*Landoltia punctate), and American black nightshade (*Solanum americanum*) have become resistant to paraquat.

Scout and know your field

- Know weed species present in the field to be treated through scouting and field history. An understanding of weed biology is useful in designing a resistance

management strategy. Ensure the weed management program will control all weeds present.

- Fields should be scouted prior to application to determine species present and growth stage. Always apply this herbicide at the full labeled rate and correct timing for the weeds present in the field.

Utilize non-herbicidal practices to add diversity

- Use diversified management tactics such as cover crops, mechanical weed control, harvest weed seed control, and crop rotation as appropriate.

Use good agronomic practices, start clean and stay clean

- Use good agronomic practices that enhance crop competitiveness.
- Plant into weed-free fields utilizing tillage or an effective burndown herbicide for control of emerged weeds.
- Sanitize farm equipment to avoid spreading seed or vegetative propagules prior to leaving fields.

Difficult to control weeds

- Fields with difficult to control weeds should be planted in rotation with crops that allow the use of herbicides with an alternative mode of action or different management practices.
- Difficult to control weeds may require sequential applications, such as a broad spectrum preemergence herbicide followed by one or more postemergence herbicide applications. Utilize herbicides containing different modes of action effective on the target weeds in sequential applications.

Do not overuse the technology

- Do not use more than two applications of this or any other herbicide with the same mode of action in a single growing season unless mixed with an herbicide with a different mode of action which provides overlapping spectrum for the difficult to control weeds.

Scout and inspect fields following application

- Prevent an influx of weeds into the field by controlling weeds in field borders.
- Scout fields after application to verify that the treatment was effective.
- Suspected- herbicide resistant weeds may be identified by these indicators
    - Failure to control a weed species normally controlled by the herbicide at the dose applied, especially if control is achieved on adjacent weeds;
    - A spreading patch of non-controlled plants of a particular weed species; and
    - Surviving plants mixed with controlled individuals of the same species.
- Report non-performance of this product to your Syngenta retailer, Syngenta representative, or call 1-866-Syngent(a) (866-796-4368). If resistance is suspected ensure weed escapes are controlled using an herbicide with an effective mode of action and/or use non-chemical means to prevent further seed production.

Prevent weed escapes before, during, and after harvest

- Do not allow weed escapes to produce seed or vegetative structures such as tubers or stolons which contribute to spread and survival. Consider harvest weed seed management and control weeds post-harvest to prevent seed production.

Resistant Weeds

- Contact your local Syngenta representative, retailer, crop advisor or extension agent to determine if weeds resistant to this mode of action are present in your area. If resistant biotypes have been reported, use the full labeled rate of this product, apply at the labeled timing, and tank-mix with a different mode of action product so there are multiple effective modes of application for each suspected resistant weed.

APPLICATION INSTRUCTIONS AND CROP USE DIRECTIONS

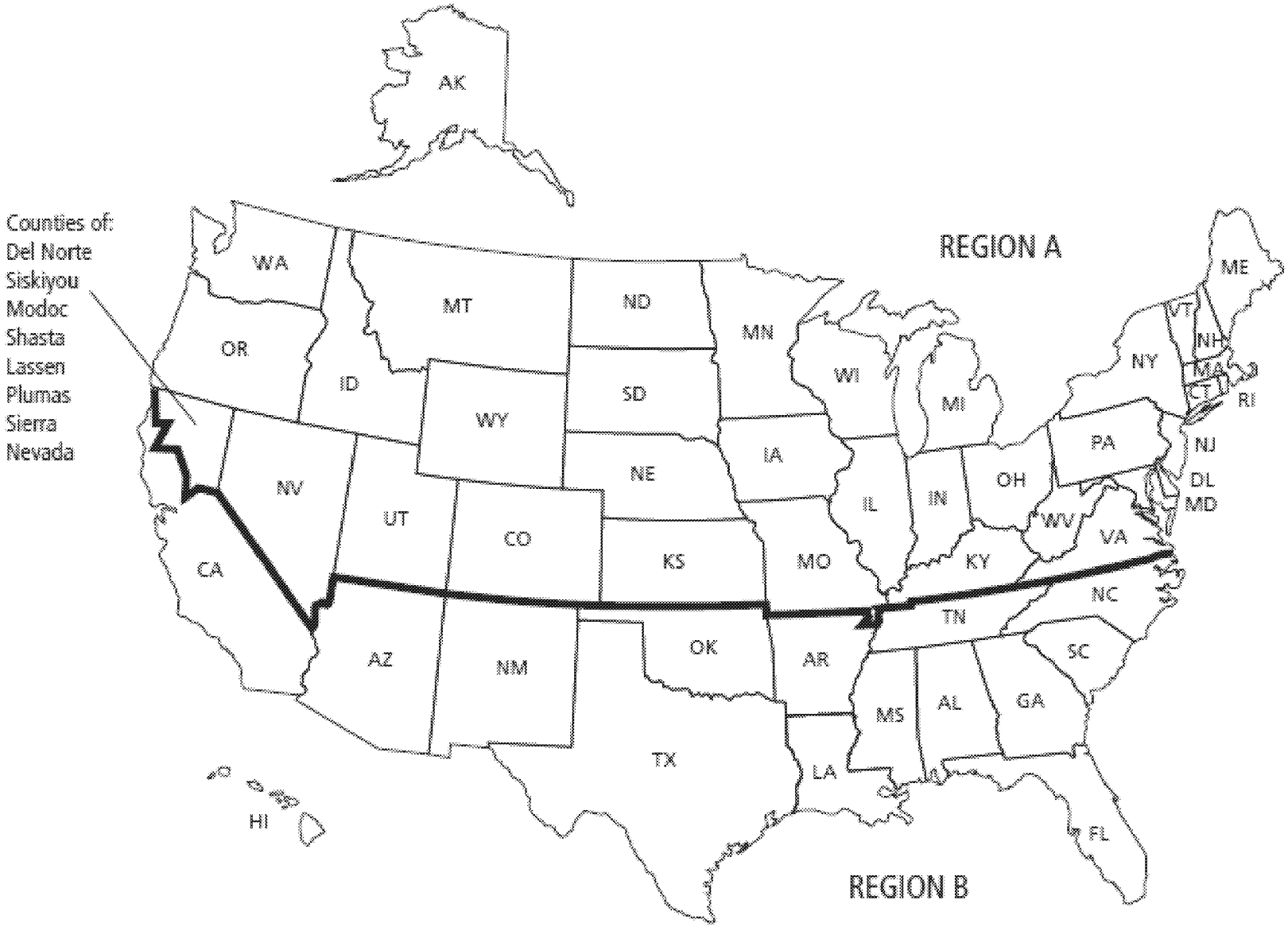
The following tables indicate use patterns, rates, minimum spray volumes, preharvest intervals and other directions specific to each crop. Read and follow directions carefully.

Crop	Maximum Number of Applications Per Year	Use Pattern	Gramoxone SL 2.0 Rate Per Acre	Minimum Total Spray Per Acre	Grazing or Preharvest Interval (Days)	Directions
ALFALFA New seedlings (California only)	1	Broadcast	1.0-2.0 pt See Table 2.	Ground: 10 gal Air: 5 gal	70	**Restrictions** • Do not cut or harvest within 70 days after application. • Do not apply more than once during the first growing season. • Do not use on seedling alfalfa grown for seed. **Precautions** • Apply during late winter or early spring. • Caution: Seedling alfalfa stands will be reduced and replanting may be necessary. • Alfalfa foliage present at time of application will be burned.
ALFALFA (No-till or conventional planting)	2	Preplant or Preemergence Broadcast or Banded Over-Row	2.5-4.0 pt	Ground: 10 gal Air: 5 gal	-	**Restrictions** • Apply prior to emergence of the crop. **Precautions** • Crop plants emerged at time of application will be killed. • Seeding should be done with a minimum amount of soil disturbance.
ALFALFA Dormant season on established plantings Region A - See map at end of Alfalfa section.	1	Broadcast	2.0-3.0 pt	Ground: 10 gal Air: 5 gal	42	**Restrictions** • Do not apply if **fall regrowth** following last fall cutting is greater than 6", or if **spring regrowth** is more than 2". • Apply to well-established stands (at least 1-year old) after the crop is dormant. • Do not cut or harvest within 42 days of application. • Do not apply more than once per season. **Precautions** • For control of weeds, including bluegrass, chickweed, henbit, downy brome, ryegrass, cheatgrass, dogfennel, tansymustard, london rocket, sowthistle, rescue brome, wild oats, and other winter annuals; and suppression of perennial weeds. • Alfalfa foliage present at the time of application will be burned which may reduce the yield of the first cutting. • Tank mix with metribuzin (Sencor) for improved burndown of weed vegetation and residual weed control. Consult the metribuzin product label for a list of weeds controlled, rates of application, and precautions.

Crop	Maximum Number of Applications Per Year	Use Pattern	Gramoxone SL 2.0 Rate Per Acre	Minimum Total Spray Per Acre	Grazing or Preharvest Interval (Days)	Directions
ALFALFA Dormant season tank mix with Velpar® L herbicide Region A - See map at end of alfalfa section.	2	Broadcast	1.0-2.0 pt	Ground: 10 gal Air: 10 gal	42	**Restrictions** • Use the 1.0 pt rate of Gramoxone SL 2.0 when weeds and grasses are less than 4" tall. • Mix with 1-2 qt of Velpar L per acre. • Do not make more than 1 application to established stands during the dormant season. • Do not apply if **fall regrowth** following last fall cutting is greater than 6", or if **spring regrowth** is more than 2". • Do not apply to alfalfa during the first season after seeding. • **DO NOT USE** on gravelly or rocky soils, exposed subsoils, hardpan, sand or poorly drained alkaline soils as crop injury, including mortality, may result. • Do not cut or harvest within 42 days of application. **Precautions** • For control of weeds such as chickweed, downy brome and tansymustard. • Use the lower rate of Velpar L on loamy sands or sandy loams. Refer to Velpar L label for directions, limitations, cautions and for a list of weeds controlled. • Temporary chlorosis may occur on alfalfa regrowth. • Stress which may be caused in part by low fertility, disease, insects, winterkill, over cutting, drought or frost may increase the chances of crop injury.

Crop	Maximum Number of Applications Per Year	Use Pattern	Gramoxone SL 2.0 Rate Per Acre	Minimum Total Spray Per Acre	Grazing or Preharvest Interval (Days)	Directions
ALFALFA Dormant Season On established plantings: Region B-See map at end of Alfalfa section.	1	Broadcast	1.0-2.0 pt	Ground: 10 gal Air: 5 gal	60	**Restrictions** • Apply during late fall or winter months after the last fall cutting and before first spring cutting. • In the California counties of Orange, Riverside and all counties north of these counties, do not apply if **spring regrowth** after grazing or cutting is more than 2". In all other areas within Region B, do not apply if **regrowth** after grazing or cutting is more than 2". • Do not harvest within 60 days of application. • Do not apply more than once per season. • Do not apply tank mix with metribuzin on newly established (less than 1-year old) alfalfa. **Precautions** • For desiccation of weeds, including London rocket, sowthistle, rescue brome, wild oats, chickweed, ryegrass, bluegrass, cheatgrass, dogfennel, tansymustard, henbit, downy brome, and other winter annuals; and suppression of perennial weeds. • CAUTION: Applications to alfalfa that is not dormant, or has broken dormancy, may result in stand and/or yield reductions. Replanting may be necessary. Green alfalfa foliage present at the time of application will be burned. • Total hay yield of first cutting may be reduced in alfalfa fields with severe weed infestation. This reduction will usually be directly proportionate to the loss of weed weight. • Tank mix with metribuzin (Sencor) for improved burndown of weed vegetation and residual weed control in **dormant established** (at least 1-year old) alfalfa. Consult the metribuzin product label for a list of weeds controlled, rates of application, and precautions. **California** **Precautions** • For desiccation of weeds including bluegrass, ryegrass, shepherdspurse, chickweed, tansymustard, foxtail, sowthistle and groundsel. • Use high rate if ryegrass, shepherdspurse, sowthistle or groundsel is present.
On fall-seeded, newly established stands less than 1-year-old: Region A- See map at end of Alfalfa section.	1	Broadcast	1.0-2.0 pt	Ground: 10 gal Air: 5 gal	60	
On fall-seeded, newly established stands less than 1- year-old: Region B- See map at end of Alfalfa section.	1	Broadcast	0.75-1.25 pt	Ground: 10 gal Air: 5 gal	60	

Crop	Maximum Number of Applications Per Year	Use Pattern	Gramoxone SL 2.0 Rate Per Acre	Minimum Total Spray Per Acre	Grazing or Preharvest Interval (Days)	Directions
ALFALFA Between-cuttings treatment in established plantings. (Includes first year alfalfa) (All states East of the Rocky Mountains)	3	Broadcast	1.0 pt	Ground: 10 gal	30	**Restrictions** • Apply immediately after alfalfa has been removed for hay or silage. • Do not treat more than 5 days after cutting. • Do not cut or harvest within 30 days of application. • Make 1-3 applications, as needed, during the growing season. These sprays may be applied in addition to a dormant application. • For first year alfalfa, do not apply more than twice during the first growing season. **Precautions** • Weeds much beyond the seedling stage and the stubble of weeds cut off during harvest will be less affected by this treatment. • CAUTION: First year alfalfa stands and yields may be reduced if alfalfa is allowed to regrow more than 2". • Alfalfa foliage present at time of application will be burned. • In arid areas where moisture is limited, weed control may be reduced.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Crop	Maximum Number of Applications Per Year	Use Pattern	Gramoxone SL 2.0 Rate Per Acre	Minimum Total Spray Per Acre	Grazing or Preharvest Interval (Days)	Directions
ALMONDS	5	Directed Spray	1.25-4.0 pt	Ground: 10 gal	-	**Restrictions** • Do not allow spray to contact green stems (except suckers) or foliage. • Do not graze treated areas. • Do not feed cover crops grown in treated areas to livestock. • All applications must be made prior to shaking for harvest. **Precautions** • Use a shield or wrap plant when spraying around young trees or vines. • For mature woody weeds, perennial weeds, late germinating weeds and green suckers, retreatment or spot treatments may be necessary.
ARTICHOKE (Globe)	3	Directed Spray	2.5-4.0 pt	Ground: 20-100 gal	1	**Restrictions** • Up to 3 applications per season, do not exceed 8 pt per season. • Applications at least 7 days apart. • Do not harvest within 24 hours of last application.
ASPARAGUS	3	Preplant or Preemergence Broadcast or Banded Over-Row	2.5-4.0 pt	Ground: 10 gal Air: 5 gal	-	**Restrictions** • Apply prior to emergence of the crop. **Precautions** • Crop plants emerged at time of application will be killed.
ASPARAGUS Preemergence to established plantings at least 2 years old	3	Broadcast or Banded Over-Row	2.5-4.0 pt	Ground: 10 gal	6	**Restrictions** • Apply prior to emergence of crop or after last harvest. **Precautions** • Crop plants emerged at time of planting will be killed.

Crop	Maximum Number of Applications Per Year	Use Pattern	Gramoxone SL 2.0 Rate Per Acre	Minimum Total Spray Per Acre	Grazing or Preharvest Interval (Days)	Directions
BEANS, DRY Sweet lupin White sweet lupin White lupin Grain lupin Adzuki beans Asparagus beans Black beans Broad beans Field beans Garbanzo beans Kidney beans Lablab beans Lima beans Moth beans Mung beans Navy beans Pinto beans Rice beans Snap beans Tepary beans Urd beans Wax beans Blackeyed peas Chickpeas Cowpeas Crowder peas Southern peas Catjang Guar **PEAS, DRY**	2	Harvest-Aid	1.2-2.0 pt	Ground: 20 gal Air: 5 gal	7	**Restrictions** • For vining type beans or bush type with lush growth, use a single application of the higher rate. • May also be applied as a split application. **DO NOT** make more than 2 applications or exceed a total of 2.0 pt/A. The split application may improve vine coverage. • Apply when the crop is mature and at least 80% of the pods are yellowing and mostly ripe with no more than 40% (bush type peas or beans) or 30% (vine type peas or beans) of the leaves still green in color. • **DO NOT** apply when weather conditions favor spray drift. A drift control agent may be included to reduce spray drift. • NOT REGISTERED FOR USE ON DRY BEANS OR DRY PEAS IN CALIFORNIA. **Precautions** • Add spreader (nonionic) at 1 qt/100 gal of spray mix.

Crop	Maximum Number of Applications Per Year	Use Pattern	Gramoxone SL 2.0 Rate Per Acre	Minimum Total Spray Per Acre	Grazing or Preharvest Interval (Days)	Directions
BERRIES Blackberries Blueberries Boysenberries Currant Elderberry Gooseberry Huckleberry Loganberry Raspberries	5	Postemergence Directed Spray	2.0-4.0 pt	Ground: 50 gal	-	**Precautions** • Apply before emergence of new canes or shoots as injury to those canes or shoots can occur. • Apply as a coarse spray to avoid crop injury from fine spray mist.
CACAO	5	Directed Spray	2.0-4.0 pt	Ground: 50-200 gal	1	**Restrictions** • Do not allow spray to contact cacao plants as injury may result. Use a shield for young trees. • Do not spray under windy conditions. • Do not graze treated areas or feed treated cover crops to livestock. **Precautions** • Apply when weeds are succulent and growth is from 1-6". • For mature woody weeds, late-germinating weeds and grasses and for perennials; retreatment or spot treatment may be necessary.
CASSAVAS **& YAMS** (Puerto Rico only)	3 2	Shielded Post Directed Spray	2.0 pt	Ground: 50 gal	90	**Restrictions** • On cassavas, do not make more than 3 applications per crop season. • On yams do not make more than 2 applications per crop season. • Do not allow spray to contact cassavas or yam plants as injury may result. • Do not spray under windy conditions. • Do not graze treated areas or feed treated forage to livestock. **Precautions** • Apply when weeds are succulent and growth is 1-6".

Crop	Maximum Number of Applications Per Year	Use Pattern	Gramoxone SL 2.0 Rate Per Acre	Minimum Total Spray Per Acre	Grazing or Preharvest Interval (Days)	Directions

CHEMICAL FALLOW
Use Information
				Ground: 5 gal
				Air: 5 gal
				
				See Directions
						Restrictions
						• Apply from immediately after harvest up to emergence of the newly seeded crop as a broadcast or band treatment.
						• By ground application, apply 5-60 gallons of spray mix per acre. If applying at <10 GPA by ground, utilize the following additional restrictions:
						  • Do not apply with floaters or exceed a speed of 10 mph.
						  • Apply with flat fan nozzles only at 30-40 PSI.
						  • Apply only in a tank mix with atrazine at a minimum of 0.5 lb ai/A.
						  • By air, apply in 5-10 gal of spray mix per acre.
						Precautions
						• Use higher spray volumes for better coverage as density of stubble, crop residue or weeds increase.
						• To control volunteer wheat or downy brome, fall-applied treatments generally work best with Gramoxone SL 2.0. If possible, tank mix with Atrazine for maximum burndown and residual control.
						• Cut wheat as high as possible to avoid cutting weeds too short, and allow the weeds to grow at least 2-3" after harvest before applying Gramoxone SL 2.0.
						• The addition of dicamba, (Banvel) or 2,4-D ester (Low Volatile) may aid in the suppression of emerged perennial broadleaf weeds and large annual broadleaf weeds.
						• Refer to 2,4-D ester (Low Volatile), Banvel or residual herbicide label(s) for directions, limitations, cautions and for a listing of weeds controlled.
						• Gramoxone SL 2.0 can be tank mixed with other herbicides labeled for use on fallow land applied by the same methods and at the same timings.
						• Weeds taller than 6" may not be controlled.
						• Weeds and grasses emerging after application will not be controlled.
						• Crop plants emerged at the time of application will be killed.

Crop	Maximum Number of Applications Per Year	Use Pattern	Gramoxone SL 2.0 Rate Per Acre	Minimum Total Spray Per Acre	Grazing or Preharvest Interval (Days)	Directions
CHEMICAL FALLOW Continuous Wheat 2-3 Month Recropping Interval	3	Broadcast	Weeds 1-3": 2.0-2.5 pt Weeds 3-6": 2.5-3.0 pt Weeds 6": 3-4.0 pt	Ground: 5 gal Air: 5 gal	-	**Restrictions** • Make application at least 45 days prior to seeding. • Use at least 2.0 pt of Gramoxone SL 2.0 per acre in tank-mix with a **Photosynthetic Inhibitor Herbicide** for volunteer wheat or downy brome control in the spring. (See Photosynthetic Inhibitor Section). **Precautions** • Refer to the Chemical Fallow Use Information section.
CHEMICAL FALLOW Wheat-Fallow-Wheat Rotations (Fall applied after harvest; seeded 12-14 months later)	3	Broadcast	Weeds 1-3": 2.0-2.5 pt Weeds 3-6": 2.5-3.0 pt Weeds 6": 3-4.0 pt	Ground: 5 gal Air: 5 gal	-	**Precautions** • Spray before weeds produce seed. • Volunteer wheat and downy brome control are better with late August or early September applications. • Gramoxone SL 2.0 can be tank mixed with other herbicides labeled for use on fallow land applied by the same methods and at the same timings. • Refer to the product labels for specific use rates for your soil type, use directions, cautions and a list of weeds controlled. • Refer to the Chemical Fallow Use Information section.
CHEMICAL FALLOW Wheat-Fallow-Wheat Rotations (Spring applied; seeded 3-5 months later)	3	Broadcast	Weeds 1-3": 2.0-2.5 pt Weeds 3-6": 2.5-3.0 pt Weeds 6": 3.0-4.0 pt	Ground: 5 gal Air: 5 gal	-	**Restrictions** • Use at least 2.0 pt of Gramoxone SL 2.0 per acre with a PSI (see **Photosynthetic Inhibitor Herbicides** section) for volunteer wheat or downy brome control in the spring. **Precautions** • Application should be made March 1 to April 15, prior to spring rains to conserve moisture. • Volunteer wheat is easier to control after the boot stage, but soil moisture loss will be greater. • Refer to the Chemical Fallow Use Information section. • Gramoxone SL 2.0 can be tank mixed with other herbicides labeled for use on fallow land applied by the same methods and at the same timings. •

Crop	Maximum Number of Applications Per Year	Use Pattern	Gramoxone SL 2.0 Rate Per Acre	Minimum Total Spray Per Acre	Grazing or Preharvest Interval (Days)	Directions
CHEMICAL FALLOW Wheat-Annual Crop[1]-Wheat Rotations (Fall applied in wheat stubble)	3	Broadcast	Weeds 1-3": 2.0-2.5 pt Weeds 3-6": 2.5-3.0 pt Weeds 6": 3.0-4.0 pt	Ground: 5 gal Air: 5 gal	-	**Precautions** • Gramoxone SL 2.0 can be tank mixed with other herbicides labeled for use on fallow land applied by the same methods and at the same timings. • Spray after wheat harvest and before weeds produce seed. If grasses such as foxtails or barnyardgrass recover, respray before they develop seed. • Volunteer wheat and downy brome are easier to control with late August to November applications. • Refer to the Chemical Fallow Use Information section.
CHEMICAL FALLOW Wheat-Annual Crop-Wheat Rotations (Spring applied prior to planting an annual crop[1]) [1]Approved Annual Crops are grain sorghum, corn, wheat, or proso millet.	3	Broadcast	Weeds 1-3": 2.0-2.5 pt Weeds 3-6": 2.5-3.0 pt Weeds 6": 3.0-4.0 pt	Ground: 5 gal Air: 5 gal	-	**Restrictions** • Use at least 2.0 pt of Gramoxone SL 2.0 per acre with a PSI (see **Photosynthetic Inhibitor Herbicides** section) for volunteer wheat or downy brome control in the spring. **Precautions** • Gramoxone SL 2.0 can be tank mixed with other herbicides labeled for use on fallow land applied by the same methods and at the same timings. •

Crop	Maximum Number of Applications Per Year	Use Pattern	Gramoxone SL 2.0 Rate Per Acre	Minimum Total Spray Per Acre	Grazing or Preharvest Interval (Days)	Directions
CLOVER AND OTHER LEGUMES[1] Dormant Season On established plantings: Region A- See map at end of Alfalfa section.	1	Broadcast	2.0-3.1 pt	Ground: 10 gal Air: 5 gal	60	**Restrictions** • Apply during late fall or winter months after the last fall cutting and before first spring cutting. • Do not apply if **regrowth** after grazing or cutting is more than 2". • Do not harvest within 60 days of application. • Do not apply more than once per season. **Precautions** • For desiccation of weeds, including London rocket, sowthistle, rescue brome, wild oats, chickweed, ryegrass, bluegrass, cheatgrass, dogfennel, tansymustard, henbit, downy brome, and other winter annuals, and suppression of perennial weeds. • CAUTION: Applications to clover or other legumes that is not dormant, or has broken dormancy, may result in stand and/or yield reductions. Replanting may be necessary. Green clover or other legumes foliage present at the time of application will be burned. • Clover or other legumes foliage present at the time of application will be discolored and temporarily stunted. • Total hay yield of first cutting may be reduced in clover or other legumes fields with severe weed infestation. This reduction will usually be directly proportionate to the loss of weed weight. **California** **Precautions** • For desiccation of weeds including bluegrass, ryegrass, shepherdspurse, chickweed, tansymustard, foxtail, sowthistle and groundsel. • Use high rate if ryegrass, shepherdspurse, sowthistle or groundsel is present.
On established plantings: Region B-See map at end of Alfalfa section.	1	Broadcast	1.0-2.0 pt	Ground: 10 gal Air: 5 gal	60	
On fall-seeded, newly established stands less than 1- year-old: Region A- See map at end of Alfalfa section.	1	Broadcast	1.0-2.0 pt	Ground: 10 gal Air: 5 gal	60	
On fall-seeded, newly established stands less than 1-year-old: Region B- See map at end of Alfalfa section. [1]Other legumes include velvetbean, lespedeza, lupine, sainfoin, trefoil, vetch, crown vetch, and milk vetch.	1	Broadcast	0.75-1.2 pt	Ground: 10 gal Air: 5 gal	60	

Crop	Maximum Number of Applications Per Year	Use Pattern	Gramoxone SL 2.0 Rate Per Acre	Minimum Total Spray Per Acre	Grazing or Preharvest Interval (Days)	Directions
CORN **FIELD CORN** **POPCORN** **SWEET CORN** **SEED CORN** (Used alone)	3	Preplant or Preemergence (Broadcast or Banded Over Row)	Weeds 1-3": 2.0-2.5 pt Weeds 3-6": 2.5-3.0 pt Weeds 6": 3.0-4.0 pt	Ground: 10 gal Air: 5 gal	-	**Precautions** • Includes field, fresh, sweet, forage, fodder and popcorn. • Seedbeds should be formed as far ahead of planting and treatment as possible to permit maximum weed and grass emergence. • Seeding should be done with a minimum amount of soil disturbance. • Weeds and grasses emerging after application will not be controlled. Crop plants emerged at time of application will be killed.
CORN Tank Mixes for No-till/Reduced Till	3	Preplant or Preemergence (Broadcast or Banded Over Row)	Weeds 1-3": 2.0-2.5 pt Weeds 3-6": 2.5-3.0 pt Weeds 6": 3.0-4.0 pt	Ground: 10 gal Air: 5 gal* *Refer to respective product labels to determine if these products can be applied by air.	-	**Restrictions** • Apply as a broadcast spray before, during or after planting, but before crop emergence. **Precautions** • Gramoxone SL 2.0 can be tank mixed with other herbicides labeled for use on corn applied by the same methods and at the same timings.

Crop	Maximum Number of Applications Per Year	Use Pattern	Gramoxone SL 2.0 Rate Per Acre	Minimum Total Spray Per Acre	Grazing or Preharvest Interval (Days)	Directions
FIELD CORN **POPCORN** **SWEET CORN** **SEED CORN**	3	Postemergence Directed Spray (Including Hooded or Shielded)	1.0-2.0 pt	Ground: 10 gal	-	**Precautions** • Apply when weeds are actively growing. • Use higher specified rate on larger or hard to control weeds. Weeds 6" or taller may not be controlled. • Severe damage and/or complete kill can occur if spray contacts corn plants. **HOODED OR SHIELDED SPRAYERS** **Restrictions** • Apply by directing spray between the rows and using hooded or shielded sprayers to prevent spray contact with crop plants. **Precautions** • To avoid excessive crop phytotoxicity, use a hooded or shielded sprayer with skids or wheels on the spray boom to maintain spray height. **DIRECTED SPRAY WITHOUT HOODED OR SHIELDED SPRAYERS** **Restrictions** • Apply when corn is at least 10" tall with nozzles arranged to spray no higher than the lower 3" of corn stalks. **Precautions** • Corn plants shorter than 10" may be injured and not recover (corn height measured from soil surface to top of whorl). • For corn greater than 20" tall, arrange the nozzles to spray no higher than the lower 1/3 of the corn stalks. • Corn foliage sprayed will be injured, but the crop will recover and develop normally.
FIELD CORN **Popcorn** **Seed Corn**	1	Harvest Aid Broadcast	1.2-2.0 pt	Ground: 20 gal Air: 5 gal	7	**Restrictions** • Make ONE (1) application at least 7 days prior to harvest. • Apply after the corn is mature after the black layer has formed at the base of the kernels (this indicates maturity). • Use 2.0 pt to desiccate mature broadleaf weeds and grasses or broadleaf weeds and grasses that are taller than 18". **Precautions** • Consult your local agricultural authority for help in identifying the black layer. • Add nonionic surfactant containing at least 75% surface active ingredient at 0.25% v/v. • Drought stressed plants, especially broadleaf weeds can be difficult to kill and desiccation may not be complete.

Crop	Maximum Number of Applications Per Year	Use Pattern	Gramoxone SL 2.0 Rate Per Acre	Minimum Total Spray Per Acre	Grazing or Preharvest Interval (Days)	Directions
FIELD CORN ONLY (grain, fodder, forage)	3	Postemergence directed spray USDA Witchweed Eradication Program	2.0 pt	Ground: 10 gal	-	**Restrictions** • Initiate sprays in late June to early July and repeat in early August if regrowth occurs. **Precautions** • Follow application instructions in postemergence directed spray section above.
FIELD CORN ONLY (grain, fodder, forage) 2,4-D Amine Tank Mix	3	Postemergence directed spray USDA Witchweed Eradication Program	8.0 fl oz + 0.5 lb 2,4-D Amine AE	Ground: 10 gal	-	**Precautions** • Apply as a directed spray onto grassy weeds and witchweed before witchweed blooms. Reapply if regrowth occurs. • Follow application instructions in postemergence directed spray section above.
COTTON **(Use Directions for all Cotton Uses)**		All Cotton Uses				**Restrictions** • Do not exceed 12 pints Gramoxone SL 2.0 (3 lb active ingredient) per acre per season for all uses on cotton.
COTTON (Used alone)	3	Preplant or Preemergence	2.5-4.0 pt	Ground: 10 gal Air: 5 gal	-	**Restrictions** • Apply prior to, during or after planting, but before crop emergence. **Precautions** • For fallow bed treatment, beds should be preformed to permit maximum weed and grass emergence prior to treatment. • Seeding should be done with a minimum of soil disturbance.
COTTON (California only; Used alone)	3	Preplant	8.0-16 fl oz	Ground: 10 gal Air: 5 gal	-	**Precautions** • For control of volunteer barley in preformed seedbeds.
COTTON Goal™ Herbicide Tank Mix	3	Preplant or Fallow Bed Broadcast	2.5-4.0 pt	Ground or Air: 10 gal	-	**Precautions** • Refer to Goal label for specific use directions and restrictions, and weeds controlled.
COTTON Other Tank Mixes	3	Preplant or Preemergence	2.5-4.0 pt	Ground: 10 gal Air: 5 gal	-	Difficult weeds can often be controlled by tank mixing Gramoxone SL 2.0 with other herbicides. The addition of herbicides which are also photosynthetic inhibitors (Herbicide Mode of Action Groups 5 & 7) will slow the activity of Gramoxone SL 2.0, allowing Gramoxone SL 2.0 to thoroughly distribute itself within the treated leaf. The resulting level of control is usually greater than if Gramoxone SL 2.0 was applied alone. (See Photosynthetic Inhibitor Section). **Restrictions** • Apply as a broadcast spray before, during or after planting, but before crop emergence. •

Crop	Maximum Number of Applications Per Year	Use Pattern	Gramoxone SL 2.0 Rate Per Acre	Minimum Total Spray Per Acre	Grazing or Preharvest Interval (Days)	Directions
COTTON	3	Postemergence Directed Spray (Precision Machine Vision Directed Spray)	1.2-2.0 pt	NA – ensure targeted weeds receive thorough spray coverage		**Restrictions** • Precision application equipment with automated detection (Machine Vision) of weed must be used to minimize contact with cotton • Do not make more than a total of 3 postemergent directed spray applications using Precision Machine Vision Directed Spray equipment or a hooded shield sprayer. **Precautions** • Apply when weeds are actively growing and before weeds reach 4" in height. • For improved control and herbicide resistance management a tank mix with Caparol is recommended • May be tank mixed with other herbicides approved for postemergence directed use in cotton. • AVOID CONTACT WITH CROP. Intentional or accidental contact (including drift) of Gramoxone SL 2.0 with the crop may result in severe damage or loss of the crop. • Equipment should be in good operating condition. Avoid leakage or dripping onto crop. Variation in equipment design may affect level of weed control.
COTTON	3	Postemergence Directed Spray (Hooded or Shielded)	1.2-2.0 pt	Ground: 10 gal	-	**Restrictions** • If multiple applications are made, do not apply the second application until 14 days after first application. • Apply by directing spray between the rows and using hooded or shielded sprayers to prevent contact with crop plants. • Do not make more than a total of 3 postemergent directed spray applications using Precision Machine Vision Directed Spray equipment or a hooded shield sprayer. **Precautions** • Apply when weeds are actively growing and before weeds reach 4" in height. • Use higher specified rate on dense populations and/or larger or hard to control weeds. Weeds 6" or taller may not be controlled. • AVOID CONTACT WITH CROP. Intentional or accidental contact (including drift) of Gramoxone SL 2.0 with the crop may result in severe damage or loss of the crop. • Equipment should be in good operating condition. Avoid leakage or dripping onto crop. Variation in equipment design may affect level of weed control. • Keep hoods or shields adjusted to insure adequate contact with weeds while shielding the crop from the herbicide. • To minimize drift, do not use nozzles or nozzle configurations or adjuvants which produce fine spray droplets (mist). • May be tank mixed with other herbicides approved for postemergence directed use in cotton. Unless otherwise instructed on this label, refer to tank mix product label for rates, directions, limitations and cautions.

Crop	Maximum Number of Applications Per Year	Use Pattern	Gramoxone SL 2.0 Rate Per Acre	Minimum Total Spray Per Acre	Grazing or Preharvest Interval (Days)	Directions
COTTON **Use directions for all cotton harvest aid uses**		Harvest Aid				**Harvest Aid Use Precautions** (Applies to all sections) **Restrictions** • Do not pasture livestock in treated fields or feed treated foliage. • If multiple applications are made, allow 7 days between applications. • Do not apply to cotton within 3 days before harvest. • Repeat application if necessary. Do not exceed a total of 2.0 pt/A as a harvest aid. **Precautions** • May be tank mixed with other cotton harvest aid materials known to be effective by the local expert. Unless otherwise instructed in this label, refer to tank mix product label for rates, directions, limitations and cautions. • Nodes above cracked bolls (NACB) timing is for guidance and is not intended to restrict the local expert in their use of the product.
SOUTHERN COTTON Harvest aid for boll opening and defoliation (tank mix with phosphate and chlorate defoliants)	4	Broadcast	8.0 fl oz + 1 pt phosphate or 1 gal chlorate	Ground: 10 gal Air: 5 gal	7	**Restrictions** • Apply when 80% or more of the bolls are open and the remaining bolls to be harvested are mature. **Precautions** • Development of immature bolls will be inhibited.
SOUTHERN COTTON Additional tank mixes for boll opening and defoliation	4	Broadcast	3.1-5.0 fl oz	Ground: 10 gal Air: 5 gal	-	**Restrictions** • Apply when 60% or more of the bolls are open and the remaining bolls to be harvested are mature. **Precautions** • To aid in defoliation and opening of mature bolls, Gramoxone SL 2.0 may be tank mixed with the following products: Aim, Sharpen, sodium chlorate.Development of immature bolls will be inhibited. • Refer to tank mix product label for rate, directions, limitations and cautions.

Crop	Maximum Number of Applications Per Year	Use Pattern	Gramoxone SL 2.0 Rate Per Acre	Minimum Total Spray Per Acre	Grazing or Preharvest Interval (Days)	Directions
SOUTHERN COTTON Post Defoliation-To aid in opening of mature bolls and to desiccate green weeds	4	Broadcast	1.0-2.0 pt	Ground: 10 gal Air: 5 gal	3	**Restrictions** • Apply when 75% or more of the bolls are open and remaining bolls to be harvested are mature. **Precautions** • Use higher specified rate if weed infestation is heavy or dense. • Development of immature bolls will be inhibited. • After a defoliation or conditioning application has been made, delay desiccation application of Gramoxone SL 2.0 approximately 3-7 days to minimize leaf sticking.
WESTERN COTTON Harvest aid for boll opening and early defoliation	4	Broadcast	5.5-8.0 fl oz + phosphate or sodium chlorate; and/or other compatible harvest aid products.	Ground: 10 gal Air: 5 gal	7	**Restrictions** • Do not use more than 8.0 fl oz of Gramoxone SL 2.0 for early defoliation as excessive desiccation may occur. • Do not use more than 4.0 lb of actual sodium chlorate defoliant per acre at this early defoliation timing. **Precautions** • Use higher specified rate of Gramoxone SL 2.0 on rank cotton. • Early defoliation timing is when 60% or more of the bolls are open and the remaining bolls to be harvested are mature (approximately 4 NACB). • Development of immature bolls will be inhibited.
WESTERN COTTON Harvest aid for boll opening and mid-to-late defoliation	4	Broadcast	8.0-16.0 fl oz alone *or* tank mix with sodium chlorate *or* phosphate defoliant and/or other compatible harvest aid products.	Ground: 10 gal Air: 5 gal	3 (Alone)	**Precautions** • In desert cotton areas or on rank vigorous cotton, use the 16 fl oz rate of Gramoxone SL 2.0. • Mid-to-late defoliation timing is when 75% or more of the bolls are open and remaining bolls to be harvested are mature (approximately 3 or fewer NACB). • Development of immature bolls will be inhibited.

Crop	Maximum Number of Applications Per Year	Use Pattern	Gramoxone SL 2.0 Rate Per Acre	Minimum Total Spray Per Acre	Grazing or Preharvest Interval (Days)	Directions
COTTON **Stripper or Spindle Harvested** Harvest aid for defoliation and boll opening	4	Broadcast	3.0-11.25 fl oz	Ground: 10 gal Air: 5 gal	3	**Restrictions** • Apply when 75% of the bolls are open and the remaining bolls to be harvested are mature. • May be applied as a split application. Do not exceed a total of 2.0 pt/A per year. **Precautions** • It is advisable, because of extremes in environmental and plant conditions, to apply the range of rates on a small block of cotton to determine the rate that best fits your needs. • Development of immature bolls will be inhibited. Slice bolls and inspect the seed for maturity. • Gramoxone SL 2.0 may be applied alone or tank mixed with the following cotton harvest aids:Aim, DEF® Defoliant, Ethephon® Plant Growth Regulant, Folex® Defoliant, Harvade® Harvest Growth Regulant, Prep PGR, Sharpen. • To avoid leaf sticking, apply Gramoxone SL 2.0 as a desiccant approximately 3-7 days after defoliation or a conditioning application and 7-14 days before harvest. • Cooler temperatures may cause a longer waiting period between application of Gramoxone SL 2.0 as a desiccant and defoliation/condition. • Lower rates in the range may be necessary south of I-10 in Texas where temperatures are typically higher during defoliation.

Crop	Maximum Number of Applications Per Year	Use Pattern	Gramoxone SL 2.0 Rate Per Acre	Minimum Total Spray Per Acre	Grazing or Preharvest Interval (Days)	Directions
COTTON Late season desiccation	4	Broadcast	1.0-2.0 pt	Ground: 10 gal Air: 5 gal	3	**Restrictions** • May be applied as a split application. Do not exceed a total of 2.0 pt/A per year. • Apply when 85% of the bolls are open and the remaining bolls to be harvested are mature (approximately 0 NACB). **Precautions** • It is advisable, because of extremes in environmental and plant conditions, to apply the range of rates on a small block to determine the rate that best fits your needs. • Development of immature bolls will be inhibited. Slice bolls and inspect the seed for maturity. • Lower rates in the range may be necessary south of I-10 in Texas where temperatures are typically higher during defoliation. • If a defoliation or conditioning application has been made, delay desiccation application of Gramoxone SL 2.0 approximately 3-7 days to minimize leaf sticking. • May be tank mixed with other harvest aid materials known to the local expert to be effective.
COTTON Suppression of Regrowth	4	Broadcast	1.0-2.0 pt	Ground: 10 gal Air: 5 gal	3	**Precautions** • Regrowth is difficult to control, therefore, thorough coverage with the full rate is necessary. • Control is dependent on growing conditions and desiccation of small new regrowth may not always be complete. • Use higher specified rate if regrowth is excessive.
EASTER LILIES (Field grown)	2	Preemergence	2.5-4.0 pt	Ground: 10 gal	-	**Restrictions** • Do not apply more than twice per season.

Crop	Maximum Number of Applications Per Year	Use Pattern	Gramoxone SL 2.0 Rate Per Acre	Minimum Total Spray Per Acre	Grazing or Preharvest Interval (Days)	Directions
FALLOW LAND Prior to planting of any crops.	2	Preplant Broadcast to Fallow Land	1.5-4.0 pt	Ground: 10 gal Air: 5 gal	-	**Restrictions** • Do not make more than 2 applications during the fallow period. **Precautions** • Fallow land may be between operations such as disking, ripping, plowing, leveling, irrigating or listing for ground preparation purposes. • Use for the control of weeds such as bluegrass, chickweed, henbit, downy brome, ryegrass, cheatgrass, dog fennel, tansy mustard, London rocket, sowthistle, rescue brome, wild oats, volunteer cereals and other winter annuals and for suppression of perennial weeds or sedges. • Use the higher rate for weeds approaching the maximum size of 6". • Allow maximum weed emergence prior to application to maximize the benefit of this use. • Adhere to the preharvest intervals and other crop specific restrictions for planted crops elsewhere on this label.
GINGER	6	Preemergence Broadcast, Postemergence, Directed Spray	2.0-4.0 pt	Ground: 20 gal	14 days for immature ginger roots, 75 days for mature ginger roots	**Restrictions** • Apply as a preemergence broadcast application before, during, or after planting but prior to crop emergence. • If multiple applications are made, allow 30 days between applications. • Do not exceed 24 pints of Gramoxone SL 2.0 (6 lb active ingredient) per acre per season. • Do not allow spray to contact ginger plants.
GRASSES (For Seed; For Use in Seedbed Preparation)	3	Preplant, At Planting, or Preemergence	2.0-4.0 pt	Ground: 10 gal	-	**Restrictions** • Repeat applications may be made prior to grass emergence, however, do not exceed 3 applications per year. • Do not graze treated areas or use the seed or straw from treated areas for animal feed or bedding. **Precautions** • Prepare the seedbeds and allow weeds to germinate. • Apply Gramoxone SL 2.0 when weeds are at the 3-5 leaf stage.
GUAR (Preharvest desiccation	3	Preharvest	2.0 pt	Ground: 10 gal	4	**Restrictions** • Do not apply until the pods are fully mature. • Do not graze treated areas or use the treated forage for animal feed.

Crop	Maximum Number of Applications Per Year	Use Pattern	Gramoxone SL 2.0 Rate Per Acre	Minimum Total Spray Per Acre	Grazing or Preharvest Interval (Days)	Directions
GUAVA	4	Directed Spray	3.75 pt	Ground: 10 gal	-	**Restrictions** • Do not allow spray to contact green stems, fruit or foliage. • Do not graze treated areas. • Do not feed cover crops grown in treated areas to livestock. **Precautions** • For mature woody weeds, late-germinating weeds and grasses, and perennials, retreatment or spot spraying may be necessary.
HOPS (ID, OR, & WA only)	3	Directed Spray and/or Suckering and Stripping	2.0 pt	Ground: 10 gal	14	**Restrictions** • Do not apply more than 3 times per season. • Do not allow spray to contact green stems, foliage, flowers, or cones as injury may result. • Do not allow animals to graze in treated hopyards. **Precautions** • Retreatment or spot treatment may be necessary. • Hop vine refuse and silage may be fed to livestock. • For suckering and stripping, spray only the basal 2 ft of the vines. • Experience with varieties other than Cascade, Yakima Cluster, and Bullion is limited. If using Gramoxone SL 2.0 on other varieties than these, test the use pattern on a small number of vines of each variety to determine sensitivity to injury. Do not use on unlisted varieties if unacceptable crop injury occurs. • Chemical Pruning: To burn back existing vines and obtain even emergence of subsequent vines, spray when vines are less than 3 ft tall. • APPLICATION TO HOP VINES LESS THAN 6 FT TALL MAY CAUSE UNACCEPTABLE INJURY.
LENTILS	2	Harvest Aid	1.2-2.0 pt	Ground: 20 gal Air: 7 gal	7	**Restrictions** • DO NOT exceed a total of 2.0 pt/A per season. • May also be applied as a split application. If applied as a split application, do not exceed a total of 2 pt/A per season. Split application may improve coverage. • Apply when crop is mature and at least 80% of the pods are yellowing and mostly ripe with no more than 30% of the leaves still green in color. • DO NOT apply when weather conditions favor spray drift. A drift control agent may be included to reduce spray drift. • NOT REGISTERED FOR USE ON LENTILS IN CALIFORNIA. **Precautions**

						• Add nonionic surfactant at 0.25% v/v (2 pt/100 gal) of the finished spray volume.

Crop	Maximum Number of Applications Per Year	Use Pattern	Gramoxone SL 2.0 Rate Per Acre	Minimum Total Spray Per Acre	Grazing or Preharvest Interval (Days)	Directions
MINT (Peppermint, Spearmint)	2	Dormant Season	2.0-3.0 pt	Ground: 10 gal Air: 5 gal	-	**Restrictions** • Apply when crop is dormant before spring growth begins and when weeds are less than 6" tall. • Do not apply more than 3.0 pt/A per dormant season. **Precautions** • For suppression of weeds such as Italian ryegrass, prickly lettuce, groundsel, chickweed, downy brome and bluegrass. • Gramoxone SL 2.0 can be tank mixed with other herbicides labeled for use on mint applied by the same methods and the same timings.
OKRA	1 2	Preemergence Broadcast Postemergence Directed Spray	2.0-4.0 pt/A 2.0 pt/A	Ground: 20 gal Ground: 20 gal	-- 21 days	**Restrictions** • Preemergence applications must be made before crop emergence. • If multiple applications are made, allow 14 days between applications. • Apply no more than 3 applications per season. • Do not exceed 8.0 pt/A (2 lb active ingredient) per season. • Do not allow spray to contact okra plants.
ONION (DRY BULB)	1 1	Preemergence Broadcast Postemergence Directed Spray	2.0-4.0 pt/A 2.0 pt/A	Ground: 20 gal Ground: 20 gal	-- 60 days	**Restrictions** • Only 1 preemergence and 1 postemergence application can be made per year. • Do not exceed 6.0 pt/A (1.5 lb active ingredient) per season. **Precautions** • Use the higher rate for heavy weed infestations or wild oat control. • For preemergence treatment, allow maximum weed emergence prior to treatment but apply before crop emergence.
ONIONS (SEEDED) AND GARLIC	1	Preplant/ Preemergence	2.5-4.0 pt	Ground: 10 gal	60 200 (CA only)	**Restrictions** • Use the higher rate for heavy weed infestations or wild oat control. Apply only one application per season at the 4.0 pt/A dosage. • Do not apply more than 4.0 pt/A. **Precautions** • Allow maximum weed and grass emergence prior to treatment but apply prior to crop emergence.

Crop	Maximum Number of Applications Per Year	Use Pattern	Gramoxone SL 2.0 Rate Per Acre	Minimum Total Spray Per Acre	Grazing or Preharvest Interval (Days)	Directions
PASSION FRUIT	5	Directed Spray	3.75 pt	Ground: 10 gal	-	**Restrictions** • If application is to be made during harvest season, pick all fruit off the ground prior to application. • Do not allow animals to graze on treated areas. **Precautions** • Use a shield or wrap vine if bark is still green at application time. • Retreatment or spot treatment may be necessary.
PEANUTS	2	Broadcast At Ground Crack Postemergence	8.0-16.0 fl oz	Ground: 10 gal	-	**Restrictions** • To control or suppress small (1-6") emerged annual grass and broadleaf weeds in peanuts at ground crack. A second application may be made up to 28 days after ground crack. • Make no more than 2 applications per season and do not apply a total of more than 16.0 fl oz of product per acre per season. • Do not apply by air. **Precautions** • For at ground crack use, Gramoxone SL 2.0 can be tank mixed with Pursuit® Herbicide or Dual Magnum for residual weed control. Consult the Pursuit or Dual Magnum label for a list of weeds controlled, rates of application, and precautions. • Crop foliage sprayed will be injured in the form of bronzing and crinkling but the crop will recover and develop normally.
PEANUTS Basagran® Herbicide Tank Mix	2	Broadcast At Ground Crack Postemergence	8.0-16.0 fl oz	Ground: 10 gal	-	**Restrictions** • This tank mix can be applied at the ground crack stage of peanuts. A second application may be made up to 28 days after ground crack. • Make no more than 2 applications per season and do not apply a total of more than 16.0 fl oz of product per acre per season. • Do not apply this tank mix if peanuts show injury (leaf phytotoxicity and/or plant stunting) produced by any other herbicide treatment as injury may be enhanced and/or prolonged. • Do not apply by air. **Precautions** • For improved control of weeds such as cocklebur, bristly starbur, smartweed and prickly sida, tank mix Gramoxone SL 2.0 with Basagran at 1 pt/A. • Crop foliage sprayed will be injured in the form of bronzing and crinkling but the crop will recover and develop normally. • Refer to the Basagran label for specific use

						directions, limitations, cautions and for a list of weeds controlled. • Do not apply this tank mix during prolonged periods of drought or unseasonably cold weather as unsatisfactory weed control may result.

Crop	Maximum Number of Applications Per Year	Use Pattern	Gramoxone SL 2.0 Rate Per Acre	Minimum Total Spray Per Acre	Grazing or Preharvest Interval (Days)	Directions
PEANUTS Butyrac® Herbicide or Butoxone® Herbicide 200 Tank Mix	2	Broadcast Postemergence	8.0-16.0 fl oz	Ground: 10 gal	-	**Restrictions** • Make no more than 2 applications per season and do not apply a total of more than 16.0 fl oz of product per season. • Do not apply by air. **Precautions** • For improved control of weeds such as cocklebur, sicklepod and morningglory tank mix Gramoxone SL 2.0 with 8-16 fl oz (0.125-0.25 lb) per acre of Butyrac or Butoxone 200. • Crop foliage sprayed will be injured in the form of bronzing and crinkling but the crop will recover and develop normally. • Refer to the complete Butyrac or Butoxone 200 label for specific use directions, limitations, cautions and for a list of weeds controlled.
PEANUTS For Suppression and/or Control of Palmer Amaranth in Peanut in (AL, AR, FL, GA, MS, NC, & SC only) For Suppression and/or Control of Florida Beggarweed in Peanut (GA only)	1	Recirculating rope wick or carpet roller	1 pt	Not Applicable	30	**Application Instructions** • Mix 1 part of Gramoxone SL 2.0 with 1 – 1.5 parts of water to prepare a 40-50% solution. • Add nonionic surfactant containing 75% or more surface-active agent at a minimum of 0.25% v/v (2 pt/100 gal or 0.32 fl oz/gal) of finished volume. • Adjust equipment to apply up to 2 pt/A of the herbicide-water mixture • Make application at least 6 inches above the peanut canopy and set application equipment to avoid dripping. • Follow application equipment manufacturer's instructions. Note: Control of large weeds is enhanced if application is made in late afternoon or early evening. **Restrictions** • Do not apply more than 1 pt/A of Gramoxone SL 2.0 using the recirculating rope wick or carpet roller application method. • **DO NOT exceed 0.5 lb ai/A/year of paraquat-containing products for all combined uses.** • Make applications of Gramoxone SL 2.0 as early as possible, and not less than 30 days before harvest to control weeds that may interfere with harvesting operations. • Do not allow livestock to graze in treated areas. • Do not feed hay or threshings from treated fields to livestock.

PERSIMMON	5	Directed Spray	3.75 pt	Ground: 10 gal	-	**Restrictions** • Do not allow spray to contact green stems, fruit, or foliage. • Do not graze treated areas. • Do not feed cover crops grown in treated areas to livestock. **Precautions** • For mature woody weeds, late-germinating weeds and grasses, and perennials, retreatment or spot spraying may be necessary.
PIGEON PEAS (Puerto Rico only)	1	Directed Spray	2.0 pt	Ground: 10 gal	60	**Restrictions** • Do not make more than 1 application per season. • Do not graze treated areas or feed treated forage to livestock. **Precautions** • Avoid contact with pigeon pea foliage. • Cannery waste can be fed to livestock.
PINEAPPLE	3	Directed Spray	2.0-4.0 pt	Ground: 10 gal	20	**Restrictions** • Do not exceed 3 applications per season. **Precautions** • Retreatment may be necessary on more mature weeds.

Crop	Maximum Number of Applications Per Year	Use Pattern	Gramoxone SL 2.0 Rate Per Acre	Minimum Total Spray Per Acre	Grazing or Preharvest Interval (Days)	Directions
RICE	3	Preplant or Preemergence Broadcast	Weeds 1-3": 2.0-2.5 pt Weeds 3-6": 2.5-3.0 pt Weeds 6": 3.0-4.0 pt	Ground: 10 gal Air: 5 gal	-	**Restrictions** • Apply as a broadcast spray before, during or after planting, but before crop emergence. Use higher specified rates and spray volumes when vegetation is dense. • Do not flood/flush within 48 hours of application in order to ensure complete kill of vegetation. **Precautions** • Seeding should be done with a minimum amount of soil disturbance. • Weeds and grasses emerging after application will not be controlled. Crop plants emerged at time of application will be killed. • For improved or extended weed control, Gramoxone SL 2.0 may be tank mixed with other herbicides registered for this use. Refer to tank mix herbicide labels for specific directions, limitations, cautions and for a list of weeds controlled. • If cool, cloudy and/or wet weather delays speed of kill, do not flood/flush until complete kill is evident.
SAFFLOWER	3	Preplant or Preemergence Broadcast or Banded Over Row	2.5-4.0 pt	Ground: 10 gal Air: 5 gal	-	**Restrictions** • Apply before, during, or after planting but before crop emergence.
SAFFLOWER (California only)	3	Preplant Broadcast	1.0 pt	Ground: 10 gal Air: 5 gal	-	**Precautions** • For control of volunteer barley in preformed seedbeds.
SMALL GRAINS (Barley, wheat)	3	Preplant or Preemergence	Weeds 1-3": 2.0-2.5 pt Weeds 3-6": 2.5-3.0 pt Weeds 6": 3.0-4.0 pt	Ground: 5 gal Air: 5 gal	-	

Crop	Maximum Number of Applications Per Year	Use Pattern	Gramoxone SL 2.0 Rate Per Acre	Minimum Total Spray Per Acre	Grazing or Preharvest Interval (Days)	Directions
SORGHUM (Grain)	3	Preplant/ Preemergence Broadcast or Band	Weeds 1-3": 2.0-2.5 pt Weeds 3-6": 2.5-3.0 pt Weeds 6": 3.0-4.0 pt	Ground: 10 gal Air: 5 gal	48 (grain) 20 (forage)	**Precautions** • Seedbeds should be formed as far ahead of planting as possible to allow maximum weed and grass emergence. • Seeding should be done with a minimum amount of soil disturbance. • Gramoxone SL 2.0 can be tank mixed with other herbicides labeled for use on sorghum applied by the same methods and at the same timings
SORGHUM (Grain)	2	Postemergence Directed (Including Hooded or Shielded)	1.0-2.0 pt	Ground: 10 gal	48 (grain) 20 (forage)	**Restrictions** • Do not exceed 2 postemergence-directed applications or exceed a total of 4.0 pt Gramoxone SL 2.0 per season. **Precautions** • Apply when weeds are actively growing. • Use higher specified rate on larger or hard to control weeds. Weeds 6" or taller may not be controlled. • Severe damage and/or complete kill can occur if spray contacts sorghum plants. • Gramoxone SL 2.0 can be tank mixed with other herbicides labeled for use on sorghum applied by the same methods and at the same timings. **HOODED OR SHIELDED SPRAYERS** **Restrictions** • Apply by directing spray between the rows and using hooded or shielded sprayers to prevent spray contact with crop plants. **Precautions** • To avoid excessive crop phytotoxicity, use a hooded or shielded sprayer with skids or wheels on the spray boom to maintain spray height. **DIRECTED SPRAY WITHOUT HOODED OR SHIELDED SPRAYERS** **Restrictions** • Apply when sorghum is at least 12" tall when naturally standing. • Do not exceed 30 psi nozzle pressure or spray under conditions which may cause excessive drift. • Use precision directed-spray application equipment adjusted so that no more than the lower 3" of the sorghum stalk is contacted by the application spray. **Precautions** • Some crop injury will occur. The degree of injury is related to the precision of application and spraying conditions.

Crop	Maximum Number of Applications Per Year	Use Pattern	Gramoxone SL 2.0 Rate Per Acre	Minimum Total Spray Per Acre	Grazing or Preharvest Interval (Days)	Directions
SOYBEANS (Use directions for all soybean uses)		All Soybean Uses				**Restrictions** • Do not exceed 11.6 pints of Gramoxone SL 2.0 (2.9 lb active ingredient) per acre per season.
SOYBEANS	3	Preplant or Preemergence	Weeds 1-3": 2.0-2.5 pt Weeds 3-6": 2.5-3.0 pt Weeds 6": 3.0-4.0 pt	Ground: 10 gal Air: 5 gal	-	**Restrictions** • Do not exceed a total of 6.0 pt of Gramoxone SL 2.0 per season. • Apply as a broadcast spray before, during or after planting, but before crop emergence. • Do not graze or harvest for forage or hay before the R3 stage of soybean development (early pod). **Precautions** • Gramoxone SL 2.0 can be tank mixed with other herbicides labeled for use on soybeans applied by the same methods and at the same timings • The lower rate may be used when weeds are less than 4" tall and a selective postemergence spray or cultivation will be made within 3 weeks after planting. • Seeding should be done with a minimum amount of soil disturbance.

Crop	Maximum Number of Applications Per Year	Use Pattern	Gramoxone SL 2.0 Rate Per Acre	Minimum Total Spray Per Acre	Grazing or Preharvest Interval (Days)	Directions
SOYBEANS	3	Spot Spray	4.8 pt/100 gal water	-	Forage/Hay: 46 Days	**Restrictions** • Do not allow spray to contact soybean plant as crop injury or death may occur. **Precautions** • Spray the solution on actively growing weeds until uniformly wet but not to the point of runoff.

Crop	Maximum Number of Applications Per Year	Use Pattern	Gramoxone SL 2.0 Rate Per Acre	Minimum Total Spray Per Acre	Grazing or Preharvest Interval (Days)	Directions
SOYBEANS	3	Postemergence Directed Spray (Includes Hooded or Shielded)	1.0-2.0 pt	Ground: 10 gal	Forage: 46 days	**Restrictions** • If multiple applications are made, allow 14-days between applications. • Do not graze or harvest for forage or hay. • Apply by directing spray between the rows and using hooded or shielded sprayers to prevent spray contact with crop plants. **Precautions** • Apply when weeds are actively growing. • For control of seedling johnsongrass, crabgrass, goosegrass, *Brachiaria*, Texas millet and pigweed less than 2" tall, use the lower rate of Gramoxone SL 2.0. • For control of 2-4" red rice, *Brachiaria*, barnyardgrass, crabgrass. goosegrass, seedling johnsongrass, giant foxtail, and fall panicum, use 8.0 fl oz of Gramoxone SL 2.0. • For control of 2-3" sicklepod, purslane, pigweed, cutleaf ground cherry, and common ragweed, use 8.0 fl oz of Gramoxone SL 2.0. • For control of 2-4" grasses in mixture with common cocklebur, morningglory, and red rice, apply Gramoxone SL 2.0 at 8.0 fl oz/A plus 0.2 lb active ingredient per acre of a 2,4-DB formulation. • Refer to the 2,4-DB label for directions, limitations, and cautions. • Use higher specified rate on larger (‹6") or hard to control weeds. Weeds 6" or taller may not be controlled. • Severe damage and/or complete kill can occur if spray intentionally or accidentally (including drift of fine droplets) contacts the plants.

Crop	Maximum Number of Applications Per Year	Use Pattern	Gramoxone SL 2.0 Rate Per Acre	Minimum Total Spray Per Acre	Grazing or Preharvest Interval (Days)	Directions
SOYBEANS	1	Harvest Aid	8.0-16.0 fl oz	Ground: 20 gal Air: 5 gal	15-day PHI Do not graze.	**Restrictions** • Do not apply within 15 days of harvest. • Do not graze or harvest for forage or hay. **Precautions** • Indeterminant varieties: Apply when at least 65% of the seed pods have reached a mature brown color or when seed moisture is 30% or less. • Determinant varieties: Apply when plants are mature, i.e., beans are fully developed, 1/2 of leaves have dropped, and remaining leaves are yellowing. • Immature soybeans will be injured. • Mature cocklebur, especially drought-stressed plants, are tolerant to Gramoxone SL 2.0 and desiccation will not be complete. Always use the higher rate for cocklebur.
SOYBEANS **(GROWN FOR RESEARCH, FIELD TRIALS AND SEED PRODUCTION ONLY)**	1	Harvest Aid	8.0-16.0 fl oz	Ground: 20 gal Air: 5 gal	3-day PHI Do not graze.	**Restrictions** • Only for use as a harvest aid with a 3-day pre-harvest interval on soybeans grown for research, field trials and seed production, including USDA regulated plantings or seed production. • Use of Gramoxone SL 2.0 as a harvest aid with a 3-day pre-harvest interval on soybeans may only be done under agreement with and following all instructions of Syngenta Crop Protection, LLC. • Do not apply within 3 days of harvest. • Do not graze or harvest for forage or hay. • Do not use or process harvested grain for food or feed. **Precautions** • Indeterminate varieties: Apply when at least 65% of the seed pods have reached a mature brown color or when seed moisture is 30% or less. • Determinant varieties: Apply when plants are mature, i.e., beans are fully developed, 1/2 of leaves have dropped, and remaining leaves are yellowing. • Immature soybeans will be injured. • Mature cocklebur, especially drought-stressed plants, are tolerant to Gramoxone SL 2.0 and desiccation will not be complete. Always use the higher rate for cocklebur.
STRAWBERRIES	3	Postemergence Directed Spray	2.0 pt	Ground: 20 gal	21	**Restrictions** • Do not apply more than 3 times per season. • Do not graze livestock in treated areas. **Precautions** • Apply by directing spray between the rows and using shields to prevent spray contact with crop plants.

						• Do not allow spray to contact strawberry plants as injury or excessive residues may result.
SUGAR BEETS	3	Preplant or Preemergence	2.0-4.0 pt	Ground: 10 gal Air: 5 gal	-	**Precautions** • Use the higher rate for heavier weed infestations. • Seeding or transplanting should be done with a minimum amount of soil disturbance. • Crop plants emerged at time of application will be killed. • Can be used in fallow bed/stale seedbed for weed control. • Seedbeds or plantbeds should be formed as far ahead of treatment as possible to permit maximum weed emergence.

Crop	Maximum Number of Applications Per Year	Use Pattern	Gramoxone SL 2.0 Rate Per Acre	Minimum Total Spray Per Acre	Grazing or Preharvest Interval (Days)	Directions
SUGARCANE	2	Postemergence Directed Spray (Includes Hooded or Shielded)				**Restrictions** • Make a second and final application, if necessary, when new weed growth is 2-6" high. • Do not graze treated areas or feed treated forage to livestock. **Precautions** • Apply as a hooded, shielded or directed spray to avoid contact with cane foliage to prevent leaf burn and yield reduction.
-- Florida --	2		2.0 pt	Ground: 50 gal	-	**Restrictions** • Do not apply after June 1 as cane growth may be stunted and yields reduced. **Precautions** • For optimum results, apply in early spring (March-April) when weeds are small.
-- Hawaii --	2		2.0 pt	Ground: 20 gal	-	**Restrictions** • Do not apply after cane rows have closed in.
-- Louisiana --	2		1.0-3.0 pt	Ground: 20 gal	30	**Precautions** • For tiller control, apply when tillers are less than 18" high. • Use the higher specified rate for heavier weed infestations or tiller growth.
-- Florida & Texas --	1	Harvest Aid	0.6-1.0 pt	Air: 5 gal	-	**Restrictions** • Apply 3-14 days before burning and harvest. **Precautions** • Use higher specified rate under cool, cloudy weather conditions.
SUNFLOWER	3	Preplant or Preemergence Broadcast or Banded Over Row	2.5-4.0 pt	Ground: 10 gal Air: 5 gal	-	**Restrictions** • Apply before, during, or after planting but before crop emergence.
SUNFLOWER	2	Preharvest Desiccation Broadcast	1.2-2.0 pt	Ground: 10 gal Air: 5 gal	7	**Restrictions** • Do not graze treated areas or feed treated forage to livestock. **Precautions** • Apply when sunflower seeds reach physiological maturity (when seed moisture is 35% or lower). For many varieties, this corresponds to the time when the back of the heads are yellow and the bracts are turning brown. • Use the higher rate when crop stands or weed infestations are heavy.

Crop	Maximum Number of Applications Per Year	Use Pattern	Gramoxone SL 2.0 Rate Per Acre	Minimum Total Spray Per Acre	Grazing or Preharvest Interval (Days)	Directions
TANIERS (Florida Only)	1 1	Preemergence Broadcast or Banded Over Row Postemergence Directed Spray	2.0-4.0 pt/A 2.0 pt/A	Ground: 20 gal	180	**Restrictions** • Preemergence applications must be made before crop emergence. • Postemergence/directed spray applications must be made with ground equipment that can direct the spray between the rows and shield to prevent spray contact with crop plants. • Only 2 applications can be made per season. • Do not exceed 6.0 pt (1.5 lb active ingredient) per season. • Allow 30-60 days between applications if 2 applications are made. • Do not apply in less than 20 gallons of water/acre. • Do not allow spray to contact plants.
TANIERS (Puerto Rico Only)	3	Shielded Post Directed Spray	2.0 pt	Ground: 50 gal	90	**Restrictions** • On taniers, do not make more than 3 applications per crop season. • Do not allow spray to contact tanier plants as injury may result. • Do not spray under windy conditions. • Do not graze treated areas or feed treated forage to livestock. **Precautions** • Apply when weeds are succulent and growth is 1-6".
TARO, DRYLAND (Hawaii Only)	2	Postemergence Directed Spray	2.0-3.0 pt	Ground: 10 gal	180	**Restrictions** • A single re-treatment may be made; however, do not harvest dryland taro within 6 months of the last application. **Precautions** • Do not allow spray to contact the taro plants as injury may result. • Make the first application when weed growth is 1-4" high. • Weeds emerging after the application will not be controlled.
TREE PLANTATION ESTABLISHMENT Deciduous and Conifers	3	Preplant Broadcast	2.0-4.0 pt	Ground: 20 gal	-	**Restrictions** • Apply prior to planting. Plant with minimal soil disturbance.Do not apply in less than 20 gal/A as weed control will be reduced. **Precautions** • Prepare ground early to allow maximum emergence of weeds. • Use the higher rate for heavier weed infestations. • For improved burndown or residual control, tank mix Gramoxone SL 2.0 with other herbicides labelled for this use.

						• Refer to the specific tank mix herbicide label(s) for rates, directions, limitations, and cautions and for a list of weeds controlled.

Crop	Maximum Number of Applications Per Year	Use Pattern	Gramoxone SL 2.0 Rate Per Acre	Minimum Total Spray Per Acre	Grazing or Preharvest Interval (Days)	Directions
TREES AND VINES Orchards, Vineyards, Windbreak, Shade & Ornamental Trees Acerola Apples Apricots Avocados Bananas/Plantains Beechnut Brazil Nut Butternut Calamondin Cashew Cherries Chestnut Chinquapin Citrus Citron Coffee Figs Filberts Grapefruit Grapes Hickory Nut Kiwi Fruit Kumquat Lemon Lime Macadamia Nuts Mandarin Nectarines Olives Orange (sour & sweet) Papayas Peaches Pears	5 except for: Apricots 3 Cherries 3 Kiwi Fruit 3 Nectarines 3 Olives 4 Peaches 3 Pistachios 5 (only 2 after shells split) Plums 3	Directed Spray	2.5-4.0 pt	Ground: 10 gal	Apricots 28 Cherries 28 Figs 13 Kiwi Fruit 14 Nectarines 28 Olives 13 Peaches 14 Pistachios 7 Plums 28	**Restrictions** • Do not allow spray to contact green stems (except suckers), fruit or foliage. • Do not graze treated areas. • Do not feed cover crops grown in treated areas to livestock. • Do not apply when figs or olives to be harvested are on the ground. • For apricots - Do not harvest within 28 days after application and do not exceed 3 postemergence directed applications per season. • For cherries - Do not harvest within 28 days after application and do not exceed 3 postemergence directed applications per season. • For figs - Do not harvest within 13 days after application and do not exceed 5 postemergence directed applications per season. • For grapes - treat when sucker growth is no more than 8" long. Late season applications to weeds should be made to avoid contact with desirable foliage. • For kiwi fruit - Do not treat more than 3 times per year. Do not harvest within 14 days after application. • For mature woody weeds, perennial weeds, late germinating weeds and green suckers, retreatment or spot treatment may be necessary. • For nectarines - Do not harvest within 28 days after application and do not exceed 3 postemergence directed applications per season. • For nuts – All applications must be made prior to shaking for harvest. • For olives - Do not harvest within 13 days after application and do not exceed 4 postemergence directed applications per season. • For peaches - Do not harvest within 14 days after application and do not exceed 3 postemergence directed applications per season. • For pistachios - Do not exceed two applications after shells split. Do not harvest within 7 days after application. • For plums - Do not harvest within 28 days after application and do not exceed 3 postemergence directed applications per season. **Precautions** • Use a shield or wrap plant when spraying around young trees or vines.

Crop	Maximum Number of Applications Per Year	Use Pattern	Gramoxone SL 2.0 Rate Per Acre	Minimum Total Spray Per Acre	Grazing or Preharvest Interval (Days)	Directions
TREES AND VINES (continued) Pecans Pistachios Plums Prunes Pummelo Satsuma mandarin Walnuts Other shade and ornamental trees such as arborvitae, ash, elm, fir, oak, pine, etc.						
TREES AND VINES Tank Mixes	5 except for: Apricots 3 Cherries 3 Kiwi Fruit 3 Nectarines 3 Olives 4 Peaches 3 Pistachios 5 (only 2 after shells split) Plums 3	Directed Spray	2.5-4.0 pt	Ground: 10 gal	Refer to other tank mix labels	**Precautions** • Gramoxone SL 2.0 can be tank mixed with other herbicides labeled for use on trees and vines applied by the same methods and at the same timings.

Crop	Maximum Number of Applications Per Year	Use Pattern	Gramoxone SL 2.0 Rate Per Acre	Minimum Total Spray Per Acre	Grazing or Preharvest Interval (Days)	Directions
PERENNIAL TROPICAL AND SUB-TROPICAL FRUIT TREES Atemoya Biriba Black sapote Canistel Cherimoya Custard apple Feijoa Ilama Jaboticaba Longan Lychee Mamey sapote Mango Pawpaw Pomegranate Pulasan Rambutan Sapodilla Soursop Spanish lime Star apple Starfruit Sugar apple Wax jambu White sapote	4	Directed Spray	2.5-3.75 pt	Ground: 10 gal	14	**Restrictions** • Do not allow spray to contact green stems (except suckers), fruit or foliage. • For suckering spray when suckers are 4 to 8 inches tall. • Do not graze treated areas. • Do not feed cover crops grown in treated areas to livestock. • If more than one application is to be made, a minimum of 28 days must be maintained between subsequent applications. • Apply only with ground equipment that provides a directed spray. **Precautions** • For mature woody weeds, late-germinating weeds and grasses, and perennials, retreatment or spot spraying may be necessary.

Crop	Maximum Number of Applications Per Year	Use Pattern	Gramoxone SL 2.0 Rate Per Acre	Minimum Total Spray Per Acre	Grazing or Preharvest Interval (Days)	Directions
TUBEROUS AND CORM VEGETABLES Arracacha; arrowroot; artichoke, Chinese; artichoke, Jerusalem; canna, edible; chayote (root); chufa; leren; potato; sweet potato; turmeric; yam bean	3	Preplant or Preemergence Broadcast	1.0-2.0 pt	Ground: 10 gal Air: 5 gal	-	**Restrictions** Apply up to ground cracking, before crop has emerged.
TUBEROUS AND CORM VEGETABLES (California, Washington, Oregon, Idaho only; Used alone) Arracacha; arrowroot; artichoke, Chinese; artichoke, Jerusalem; canna, edible; chayote (root); chufa; leren; potato; sweet potato; turmeric; yam bean	3	Preplant Broadcast	8.0-16.0 fl oz	Ground: 10 gal Air: 5 gal	-	**Precautions** • For control of volunteer barley in preformed seedbeds.
TYFON (New Hampshire only)	3	Preplant Preemergence	2.5-4.0 pt	Ground: 10 gal	-	**Precautions** • Seeding should be done with a minimum of soil disturbance. • Weeds and grasses emerging after treatment will not be controlled. • Crop plants emerged at time of application will be injured.
VEGETABLES (SEE CUCURBITS BELOW) (Seeded or Transplanted) Beans (Lima, Snap) Broccoli Cabbage Carrots Cauliflower Cavalo Broccolo Chinese Cabbage Collards Eggplant	3	Preplant Preemergence	2.0-4.0 pt	Ground: 10 gal Air: 5 gal	-	**Restrictions** • Applications can be made as a banded or broadcast treatment before, during or after planting but prior to the crop emergence.Do not harvest tomatoes within 30 days after application. **Precautions** • Seedbeds or plantbeds should be formed as far ahead of treatment as possible to permit maximum weed emergence. • Use the higher rate for heavier weed infestations. • Seeding or transplanting should be done with a minimum amount of soil disturbance. • Crop plants emerged at time of application will be

Endive (Escarole) Groundcherry Lettuce Peas Pepino Peppers Sweet Corn Tomatillo Turnips Tomatoes						killed. • Can be used in fallow bed/stale seedbed for weed control alone or tank mixed with Goal. Consult the Goal label for a list of weeds controlled, rates of application and precautions.

Crop	Maximum Number of Applications Per Year	Use Pattern	Gramoxone SL 2.0 Rate Per Acre	Minimum Total Spray Per Acre	Grazing or Preharvest Interval (Days)	Directions
VEGETABLES, CUCURBITS (Seeded or Transplanted) Cantaloupe Chayote Fruit Chinese Waxgourd Citron Melon Cucumber Gherkin Gourd, Edible *Momordica* spp. Musk Melons Pumpkin Squash Watermelons	3	Preplant Preemergence	2.0-4.0 pt	Ground: 10 gal Air: 5 gal	-	**Restrictions** • Do not exceed 10 pints of Gramoxone SL 2.0 (2.5 lb active ingredient) per acre per season. • If multiple applications, allow 14 days between applications. • Applications can be made as a banded or broadcast treatment before, during or after planting but prior to the crop emergence. **Precautions** • Seedbeds or plantbeds should be formed as far ahead of treatment as possible to permit maximum weed emergence. • Use the higher rate for heavier weed infestations. • Seeding or transplanting should be done with a minimum amount of soil disturbance. • Crop plants emerged at time of application will be killed. • Can be used in fallow bed/stale seedbed for weed control.
VEGETABLES Eggplant Tomatoes Peppers	3	Directed Spray	2.0 pt	Ground: 10 gal	-	**Restrictions** • Use precision directed spray application equipment adjusted to prevent spray contact with crop plants. Do not exceed 30 psi nozzle pressure or spray under conditions which may cause excessive drift. • Apply when weeds are succulent and weed growth is less than 6". • Do not apply more than 3 applications per season. • Do not allow animals to graze in treated areas. • Do not harvest tomatoes within 30 days after application. **Precautions** • For control or suppression of emerged weeds between rows after crop establishment.

Crop	Maximum Number of Applications Per Year	Use Pattern	Gramoxone SL 2.0 Rate Per Acre	Minimum Total Spray Per Acre	Grazing or Preharvest Interval (Days)	Directions
VEGETABLES Tomatoes	2	After Final Harvest	2.4-3.75 pt	Ground: 40-120 gal	-	**Restrictions** • DO NOT apply more than a total of 1.875 lb active ingredient (paraquat) per acre per season. **Precautions** • Add NIS containing 75% or more surface active agent at 0.125 v/v (1 pt/100 gal spray solution). • Thorough coverage of the tomato vines is required to ensure maximum herbicide burndown. • Use of dirty or muddy water may deactivate Gramoxone SL 2.0. • To help facilitate removal of Sweet Potato Whitefly, burn tomato vines with propane burners as soon as possible after the vines have dried down sufficiently. • To minimize drift, do not use nozzles or nozzle configurations which produce fine spray droplets (mist).
VEGETABLES (California, Washington, Oregon, Idaho only) Lettuce Melon Sugar Beets Tomatoes	2	Broadcast	0.75-1.0 pt	Ground: 10 gal Air: 5 gal	-	**Restrictions** • Do not harvest tomatoes within 30 days after application. **Precautions** • For control of volunteer barley in preformed seedbeds.
VEGETABLES Rhubarb	2	Dormant	2.5-4.0 pt	Ground: 10 gal	-	**Restrictions** • Apply during dormant season before buds in crown begin to grow. • Do not make more than 2 applications per season.

ALFALFA

Table 2. New Seedlings - Suppression and control of broadleaf weeds and grasses in new alfalfa seedlings grown for hay (California only)

	Rate/Acre	
For Control of:	**For Suppression**	**For Control**
Spikeweed (4 inches tall or less)	8 fl oz	16-24 fl oz
Volunteer Small Grain (8 inches tall or less)	8-16 fl oz	32 fl oz
Fiddleneck (6 inches tall or less)	8-16 fl oz	32 fl oz
Shepherdspurse	16-32 fl oz	-
Annual Bluegrass	-	16-32 fl oz
Chickweed	-	16-32 fl oz
Red Maids (6 inches tall or less)	-	16-32 fl oz

Do not use the 8.0 fl oz rate unless the alfalfa has at least 3 trifoliate leaves; the 16.0 fl oz rate unless the alfalfa has 6 trifoliate leaves; or rates over 16.0 fl oz unless there are 9 trifoliate leaves.

RESIN SOAKING

Pines (Loblolly, Shortleaf, Longleaf, Slash, Virginia, Pond, Pitch, and Spruce Pines)

Tree Selection - Select trees to be treated from stands on sites not subject to periods of extreme drought stress as the desiccating effect of Gramoxone SL 2.0 to pines is accentuated during such periods, causing a reduction in the amount of oleoresin deposited in the xylem. Select trees to be treated from vigorous, nonstagnated stands, either natural or planted. In stagnated stands or commercial timber stands, plan treating with Gramoxone SL 2.0 not sooner than three years after a commercial thinning.

Application Directions - Apply Gramoxone SL 2.0 diluted in water to a suitable wound in the tree trunk to bring the treatment into contact with the xylem (sapwood).

Bark Streaks or Cuts: This type of wound is made using a standard or rotary bark hack or a chainsaw chipping tool employed in naval stores work to remove a single 1-inch wide streak of bark about 1-2 ft from ground level. The total length should not exceed 1/3 of the tree circumference. Multiple streaks or cuts can result in serious girdling of the trunk and premature death of the tree. A coarse spray (about 1.7-5.0 ml) Gramoxone SL 2.0 solution (1-5% cation, wt/wt basis) should be applied to runoff to the exposed xylem, using a low-pressure sprayer. The amount of spray required per cut depends on tree circumference and the length of cut or streak (1/3 of circumference).

For a 9-inch diameter tree, 3 ml of spray will cover the 1-inch wide streak. Using 3 ml of a 3 or 6% Gramoxone SL 2.0 solution will result in application of 60 or 120 mg. Gramoxone SL 2.0 per streak.

Time of Treatment: Resin soaking can occur from treatments made any time of the year; however, cool season treatments under nondrought conditions usually result in less severe pine beetle infestations and longer tree life.

Interval Between Treatment and Tree Harvest: The interval between application of Gramoxone SL 2.0 and tree harvest should be a minimum of 6 months and preferably from 12-24 months. Intervals of over 6 months may not be possible under conditions of drought or serious pine beetle attacks, which may make early harvest necessary. The Gramoxone SL 2.0 treatment may encourage beetle attack, or may cause premature death of the tree. Desiccation of the xylem tissue, rather than the desired resin soaking, may occur, and is more likely at higher dosage rates.

Effect on Stem Growth: Gramoxone SL 2.0 treatment can result in reduced stem growth during the interval between treatment and tree harvest.

Dilution Table for Gramoxone SL 2.0 (2.0 lb cation per gallon):

Concentration of Cation Desired (Wt/Wt Basis)	To 1 Gallon of Gramoxone SL 2.0 Add the Following No. Gal of Water:
0.2%	118.8
0.5%	46.8
1.0%	22.9
2.0%	10.9
3.0%	6.9
4.0%	4.9
5.0%	3.7

Crop	Maximum Number of Applications Per Year	Use Pattern	Gramoxone SL 2.0 Rate Per Acre	Minimum Total Spray Per Acre	Grazing or Preharvest Interval (Days)	Directions
CONSERVATION RESERVE, FEDERAL SET-ASIDE, CONSERVATION COMPLIANCE PROGRAMS (For use in compliance with the Federal Conservation Reserve Program or Federal set-aside programs).	3	Broadcast	2.5-4.0 pt	Ground: 10 gal Air: 5 gal	-	**Precautions** • For improved emerged weed control or extended weed control, Gramoxone SL 2.0 may be tank mixed with other herbicides registered for this use. Refer to tank mix herbicide labels for specific directions, limitations, cautions and for a list of weeds controlled.
NONCROP USES	10	Broadcast or Spot Treatment	2.5-4.0 pt	Ground: 10 gal	-	**Precautions** • For use in noncrop areas such as public airports, electric transformer stations, pipeline pumping stations, around commercial buildings, storage yards and other installations, fence lines or similar noncrop areas. • Avoid contact with the foliage of ornamentals or desired plants.
PASTURE RESEEDING For suppression of existing sod and undesirable emerged broadleaf weeds and grasses prior to or at time of planting grasses or forage legumes	3	Broadcast	1.0-2.0 pt	Ground: 10 gal Air: 5 gal	See specific geographic comments	**West of Cascade and Sierra Nevada Mountains** **Restrictions** • Do not use in areas with heavy sod and weed growth. **Precautions** • Apply in October through December after first fall rains and after weeds have emerged and sod has started new growth. • For best seeding results, apply on moderately to heavily grazed areas. **East of Rocky Mountains** **Restrictions** • Apply prior to, or at time of seeding grasses or forage legumes. • Apply only to grazed or mowed pastures not more than 3" in height at time of treatment. **Precautions** • Use the 2.0 pt rate on vigorous or coarse sod species such as bromegrass.
						Bermudagrass or Bahiagrass Sods **Precautions** • Apply in late summer or early fall to sod not exceeding 3 inches in height. • For control of emerged Little Barley, apply in February or March before the midboot stage of Little Barley.

Crop	Maximum Number of Applications Per Year	Use Pattern	Gramoxone SL 2.0 Rate Per Acre	Minimum Total Spray Per Acre	Grazing or Preharvest Interval (Days)	Directions
						Bermudagrass and Coastal Bermudagrass Pastures **Restrictions** • Do not mow for hay until 40 days after treatment. **Precautions** • Apply when bermudagrass is dormant. • For control of little barley, apply before the mid-boot stage.
For Control of Endophyte-Fungus-Infected Fescue Forage Legume/Grass Mixture and Other Grass Pastures	2	Broadcast (Split Application)	1.0-2.0 pt followed by 1.0-2.0 pt	Ground: 10 gal	-	**Restrictions** • Use split applications of 10-21 days apart if necessary. • Do not exceed 4.0 pt/A total in preparation for reseeding. **Precautions** • For spring plantings, the initial application of 1.0-2.0 pt may be made the previous fall. • Apply when fescue is actively growing and no more than 4" high. • To reduce the infestation of endophyte-infested grass, do not allow fescue to go to seed starting with the preceding year's crop.
*For Prickly Pear Desiccation in Pastures *Not for use in California.	10	Spot Sprays	1.0 fl oz per gallon of water	Spray to wet weed foliage		**Restrictions** • Do not use more than 2.5 pt of Gramoxone SL 2.0 per acre per year. **Precautions** • Knapsack, backpack sprayers, pump-up pressure sprayers, hand-guns, hand wands, and other hand-held equipment can be used to direct the spray onto weed foliage for spray to wet applications **ONLY** if the application equipment allows the product to be transferred into the sprayer using a closed system as specified in the USE INSTRUCTIONS AND INFORMATION section of this label. • Mix 1.0 fl oz of Gramoxone SL 2.0 and 1/3 fl oz of a nonionic surfactant per gallon of water. • Spray coverage should be uniform and provide complete cover of all green prickly pear foliage. • Apply in May through September for best desiccation results. • Apply only to pastures with no more than 3" of height at time of treatment. • For improved desiccation and perennial control of Prickly pear, tank mix with Grazon P+D Specialty Herbicide at a rate of 1-2 fl oz per gallon of water. • Refer to the Grazon P+D Specialty Herbicide label for directions, restrictions, and precautions.

Crop	Maximum Number of Applications Per Year	Use Pattern	Gramoxone SL 2.0 Rate Per Acre	Minimum Total Spray Per Acre	Grazing or Preharvest Interval (Days)	Directions
*For Juniper Species leaf moisture reduction or desiccation prior to **Prescribed** burning of pastures *Not for use in California.	10	Broadcast	2.0 pt	Air: 5 gal		**Restrictions** • Use 2% v/v nonionic surfactant in a minimum of 5 gpa spray solution. • Do not graze livestock after application **or** prior to burning. **Precautions** • Use only in conjunction with prescribed burning as recommended and monitored by local SCS or University and Extension Range Specialists. • Apply during hot, dry weather conditions (generally July and August). • Juniper leaf moisture content should be monitored; however, maximum leaf moisture reduction generally occurs 3-4 weeks after Gramoxone SL 2.0 application. • Significant soil moisture and/or wet weather conditions prior to **or** after application will decrease the potential for Juniper Crown burns. • Cool or humid weather conditions also adversely affect leaf moisture reduction.
*Native Pastures *Not for use in California.	2	Broadcast	1.5-1.8 pt	Ground: 10 gal Air: 5 gal		**Restrictions** • Apply in spring after 90% node formation of brome species, but before full bloom. • Do not apply more than 1.8 pt Gramoxone SL 2.0 per year. • Apply only to pastures with no more than 3" of height at time of treatment. **Precautions** • Apply Gramoxone SL 2.0 for control of Downy and Japanese Brome. • Emerged native perennial grasses will be burned by application, but application after 90% node formation will allow adequate time for native grasses to recover and attain maximum growth in the use season.

Conversion Table Gramoxone SL 2.0 to Be Applied			
Fluid Ounces	**Pints**	**Lb ai**	**Acres/Gallon**
16.0	1.0	0.25	8.00
24.0	1.5	0.375	6.00
32.0	2.0	0.5	4.00
40.0	2.5	0.625	3.20
48.0	3.0	0.75	2.66
56.0	3.5	0.875	2.28
64.0	4.0	1.00	2.00

SPECIAL LOCAL USES

Crop	Maximum Number of Applications	Use Pattern	Gramoxone SL 2.0 Rate/Acre	Minimum Total Spray per Acre	Grazing or Preharvest Interval	Directions
CITRUS HYBRIDS (Tangelos, Tangors, Temple orange, Clementines) For Use Only in the State of CALIFORNIA	5	Directed Spray	2.5 - 4.0 pt	Ground: 10 gal	-	**Restrictions** • Maximum of 5 applications per year. • Pre-harvest Interval – 0 days. • DO NOT allow spray to contact green stems (except suckers), fruit or foliage. • Use a shield or wrap plant when spraying around young trees. • DO NOT graze treated areas. • DO NOT feed cover crops grown in treated areas to livestock. • DO NOT apply when weather conditions favor drift from treated areas. • DO NOT apply by ground equipment within 25 ft or by air within 75 ft of lakes; reservoirs; rivers; permanent streams, marshes or natural ponds; estuaries; and commercial fish ponds. • Make ground applications when the wind velocity favors on target product deposition, (approximately 3-10 mph). Do not apply when wind velocity exceeds 10 mph for ground applications or 7 mph for aerial applications. • DO NOT apply this product through any type of irrigation system. • DO NOT enter treated field within 12 hours of application. **Precautions** • Follow recommended spray volumes listed. These are minimum volumes only, and spray volumes should be increased as necessary to obtain complete coverage of the target weed or plant without runoff from the foliage.
GRASSES (Kentucky Bluegrass grown for seed only) For Use Only in the state of	2	Post Harvest Desiccation to facilitate burning	1.5-2.25 pt	Ground: 10 gal Air: 5 gal	-	**Restrictions** • Make application 1-4 weeks after harvest and wait 3-7 days before burning fields. • Do not graze or feed hay from treated fields prior to burning. • Do not apply this product through any type of irrigation system.

Crop	Maximum Number of Applications	Use Pattern	Gramoxone SL 2.0 Rate/Acre	Minimum Total Spray per Acre	Grazing or Preharvest Interval	Directions
Minnesota						**Precautions** • For use on Kentucky bluegrass seed production fields in Minnesota as a post-harvest application to facilitate burning. • Add a nonionic surfactant at a rate of 1 pint per 100 gal (75% or greater surface active ingredient) or 2 pints per 100 gallons (50-74% surface active ingredient).
PEANUTS For Use Only in the States of Florida and Georgia	2	Broadcast Prior to Planting	1.9-3.75 pt	Ground: 10 gal	-	**Restrictions** • Always add either: 1) Nonionic surfactant containing 75% or more surface agent at 0.25% v/v (2 pints per 100 gallons), of the finished spray volume, ***OR*** 2) Crop oil concentrate (non phytotoxic) containing 15 to 20% approved emulsifier, at 1% v/v (1 gallon per 100 gallons) of the finished spray volume). • DO NOT apply by air. **Precautions** • For burndown of weeds in peanut fields prior to planting. • Use the higher rate on dense populations and/or on larger or harder to control weeds. Apply when weeds are actively growing and between 1" to 6" in height. Vegetation 6" or taller may not be controlled. • Gramoxone SL 2.0 may be tank-mixed with other herbicides registered for this use for improved weed control. • Weeds emerging after application will not be controlled.

Crop	Maximum Number of Applications	Use Pattern	Gramoxone SL 2.0 Rate/Acre	Minimum Total Spray per Acre	Grazing or Preharvest Interval	Directions
POTATO (late blight disease control) For Use Only in the State of Maine	2	Broadcast for control of late blight disease	2.5 pt	Ground: 20 gal	-	**Restrictions** • **This is a CROP DESTRUCT use. Crop must be destroyed and tubers not allowed to enter channels of trade. All tubers must be disked-in after desiccation.** • Make a second application if necessary to obtain additional desiccation where vine growth is dense. • Allow a minimum of 5 days between applications. • Do not graze livestock in treated area. • Do not apply this product through any type of irrigation system. **Precautions** • For Desiccation of Potato Plants to Control Late Blight Disease • Apply broadcast over-the-top of infected plants. • Add a nonionic surfactant at 1.0 quart per 100 gallons of spray mix.

Crop	Maximum Number of Applications	Use Pattern	Gramoxone SL 2.0 Rate/Acre	Minimum Total Spray per Acre	Grazing or Preharvest Interval	Directions
STRAWBERRIES (Post-Harvest) For Use Only in the State of Florida.	3	Broadcast	1.95 pt	Ground: 30 gal	-	**Restrictions** • Always use one of the following: 1) A nonionic surfactant containing 75% or more surface-active agent at 0.125% v/v (1 pint per 100 gal) or a nonionic surfactant containing 50-74% surface-active agent at 0.25% v/v (2 pints per 100 gal), of the finished spray volume, ***OR*** 2) A crop oil concentrate (non phytotoxic) containing 15-20% approved emulsifier, at 1.0% v/v (1 gal/100 gal) of the finished spray volume. • For use only on fields where harvest operations have finished for the season. DO NOT use treated fruit for human or animal consumption. • DO NOT apply more than 5.85 pt of Gramoxone SL 2.0 per acre per season. • DO NOT apply when weather conditions favor drift from treated areas. • DO NOT graze livestock in treated areas. • Do not apply this product through any type of irrigation system. **Precautions** • For desiccation of strawberry plants in Florida following harvest. • Use flat fan nozzles for the most effective application.

Crop	Maximum Number of Applications	Use Pattern	Gramoxone SL 2.0 Rate/Acre	Minimum Total Spray per Acre	Grazing or Preharvest Interval	Directions
SUGARCANE For Use Only in the State of Louisiana	2	Broadcast Prior to Sugarcane Emergence Or When Sugarcane has No More Than 4 Leaves	1.9-3.75 pt	Ground: 10 gal Air: 5 gal	30 days	**Restrictions** • Do not exceed 6 pt Gramoxone SL 2.0 per acre per season. • Do not apply this product through any type of irrigation system. • Do not graze treated areas of feed treated forage to livestock. **Precautions** • For control of annual ryegrass and other weeds prior to or after crop emergence (but only when sugarcane has no more than four leaves) in sugarcane in Louisiana. • For improved burndown and residual control, tank mix Gramoxone SL 2.0 with atrazine or diuron (Karmex or Direx). • For best results, apply when weeds and grasses are succulent and weed growth is 1 to 6 inches. • Use the higher specified rate for larger weeds. • Failure to add a nonionic surfactant or crop oil concentrate will result in reduced performance of Gramoxone SL 2.0. Add either: 1) a nonionic surfactant containing 75% or more surface-active agent at 0.125% v/v (1 pt per 100 gals), ***OR*** 2) add a nonionic surfactant containing 50-74% surface-active agent at 0.25% v/v (2 pt per 100 gal), of the finished spray volume for ground applications. For aerial applications, add 1) a nonionic surfactant at 0.25% v/v (2pt per 100 gal) of the finished spray volume, ***OR*** 2) A crop oil concentrate (nonphytotoxic) containing 15-20% approved emulsifier, at 1.0% v/v (1gal per 100 gal) of the finished spray volume for ground applications. For aerial applications, add 1 pt of crop oil concentrate per acre.

Crop	Maximum Number of Applications	Use Pattern	Gramoxone SL 2.0 Rate/Acre	Minimum Total Spray per Acre	Grazing or Preharvest Interval	Directions
TOBACCO For Use Only In the States of Kentucky, North Carolina and Tennessee	2	Broadcast Prior to Transplant of Tobacco	2.4-3.75 pt	Ground: 10 gal	-	**Restrictions** • Do not graze treated areas or feed treated cover crops to livestock. **Precautions** • For burndown of weeds and cover crops during early Spring prior to transplant of tobacco. • Use the higher rate on dense populations and/or on larger or harder to control weeds. • Apply when weeds or cover crop are actively growing and between 1" to 6" in height. • Vegetation 6" or taller may not be controlled. • Weeds that emerge after the application will not be controlled. • Gramoxone SL 2.0 may be tank-mixed with other herbicides registered for this use for improved burndown. • Add either: 1) A non ionic surfactant containing 75% or more surface active agent at 0.25% v/v (2 pt per 100 gal), of the finished spray volume for ground applications, ***OR*** 2) A Crop Oil Concentrate (non-phytotoxic) containing 15-20% approved emulsifier, at 1.0% v/v (1 gal per 100gal) of the finished spray volume.

Crop	Maximum Number of Applications	Use Pattern	Gramoxone SL 2.0 Rate/Acre	Minimum Total Spray per Acre	Grazing or Preharvest Interval	Directions
TREES AND VINES **MACADAMIA NUTS** For Use Only in the State of Hawaii	4	Directed Spray for application to control weeds while macadamia nuts are on the ground.	1.9 pt	Ground: 30 gal	1 day	**Restrictions** • Application must be a directed spray at 1.9 pints Gramoxone SL 2.0 applied in 30 to 150 gal per acre. • Do not allow spray to contact green stems or foliage, as injury may result. • Do not spray under windy conditions and use a shield for young trees. • Do not allow animals to graze on treated areas. • Harvest is permitted after applications have been made to nuts on the ground. • **Treatments should be made immediately after harvest to minimize the number of nuts on the ground at the time of application.** • Do not apply through any type of irrigation system. **Precautions** • Add Spreader (nonionic) at 8 to 32 fl oz per 100 gal • Apply when weeds and grasses are 1-6" high. • For mature woody weeds, green suckers, late germinating weeds and grasses and for perennials – retreatment or spot treatment may be necessary.
TREES AND VINES **GRAPES** For Use Only in the State of California	1	Broadcast aerial application to dormant vines	1.1-1.9 pt	Air: 10 gal		**Restrictions** • Do not apply more than once per season. • Do not enter treated field within 24 hours after application. • Do not apply if internal tissues of the buds are exposed as injury to the developing buds will result. **Precautions** • Gramoxone SL 2.0 can be applied by air for control of emerged annual weeds in grapes (dormant application). • Apply when weeds are succulent and growth is from 1 to 6 inches high. • Add a nonionic surfactant containing 50% surface-active agent at 1-2 pt per 100 gallons of the finished spray volume.

Crop	Maximum Number of Applications	Use Pattern	Gramoxone SL 2.0 Rate/Acre	Minimum Total Spray per Acre	Grazing or Preharvest Interval	Directions
TULIP, NARCISSUS, IRIS For Use Only in the State of Washington	2	Broadcast Spray prior to bulb emergence	1.9-3.75 pt	Ground: 30 gal	-	**Restrictions** • Do not apply this product through any type of irrigation system. **Precautions** • For control of annual and broadleaf weeds and grasses in tulips, narcissus and iris. • When using this product in Eastern Washington, refer to the Washington State Department of Agriculture's restrictions on the use of desiccant herbicides. • Add a nonionic surfactant containing at least 50% surface active ingredient at 1–2 pints per 100 gal of dilute spray. • Gramoxone SL 2.0 is a contact-type herbicide. It is essential to obtain complete coverage of target weeds to get good control.
VEGETABLES, CUCURBITS Cucumber Gherkin Pumpkin Squash Watermelon Muskmelon Citron melon Chayote Chinese waxgourd Gourd, edible *Momordica* spp. For Use Only in the State of California	3	Directed Spray or Spot Spray	1.9 pt	Ground: 20 gal	1 day	**Restrictions** • Do not harvest within one (1) day of application. • Do not enter treated field within 24 hours after application. • Do not allow spray to contact cucurbit foliage or fruit as crop damage will occur and render fruit unfit for sale. • Do not apply this product through any type of irrigation system (chemigation). • Do not allow animals to graze in treated areas. **Precautions** • For control of emerged weeds between rows after crop establishment. • Always add a nonionic surfactant containing 50% surface-active agent at 1-2 pt per 100 gal of the finished spray volume.
VEGETABLES, CUCURBITS Cucumber Gherkin Pumpkin Squash	3	Directed Spray or Shielded Spray	1.9-2.4 pt	Ground: 20 gal	1 day	**Restrictions** • Do not exceed 30 psi nozzle pressure or spray under conditions which may cause excessive drift. • Do not use on soils with less than 5% clay. • Do not allow animals to graze in treated areas.

Crop	Maximum Number of Applications	Use Pattern	Gramoxone SL 2.0 Rate/Acre	Minimum Total Spray per Acre	Grazing or Preharvest Interval	Directions
Watermelon Muskmelon Citron melon Chayote Chinese waxgourd Gourd, edible *Momordica* spp. For Use Only in the State of Tennessee						• Always use a high quality non-ionic surfactant. • DO NOT allow spray to contact green stems or foliage, as injury may result. • DO NOT apply this product through any type of irrigation system. **Precautions** • For control of emerged weeds between rows after crop establishment. • Apply when weeds are succulent and weed growth is less than 6". • Use precision directed spray equipment adjusted to prevent spray contact with crop plants.
VEGETABLES Cucumber Melons Pumpkin Squash For Use Only in the States of Georgia, Maine, Maryland, Pennsylvania, and Virginia	3	Directed/Shielded Spray	1.95 pt	Ground: 20 gal	-	**Restrictions** • Do not exceed 30 psi nozzle pressure or spray under conditions which may cause excessive drift. • Do not use on soils with less than 5% clay. • Do not allow animals to graze in treated areas. • Always use a high quality non-ionic surfactant. • DO NOT allow spray to contact green stems or foliage, as injury may result. • DO NOT apply this product through any type of irrigation system. **Precautions** • For control or suppression of emerged weeds between rows after crop establishment. • Use precision directed spray equipment adjusted to prevent spray contact with crop plants. • Apply when weeds are succulent and weed growth is less than 6".
VEGETABLES Cucumber Melons Pumpkin Squash	3	Directed/Shielded Spray	1.95 pt	Ground: 20 gal	-	**Restrictions** • Use precision directed spray equipment adjusted to prevent spray contact with crop plants. • Apply when weeds are 6" or less in height and actively growing.

Crop	Maximum Number of Applications	Use Pattern	Gramoxone SL 2.0 Rate/Acre	Minimum Total Spray per Acre	Grazing or Preharvest Interval	Directions
For Use Only in the State of Delaware						• Do not exceed 30 psi nozzle pressure or spray under conditions which may cause excessive drift. • Do not allow spray to contact green stems or foliage, as injury may result. • Do not use on soils with less than 5% clay. • Do not allow animals to graze in treated areas. • Do not apply after bloom. • DO NOT apply this product through any type of irrigation system. **Precautions** • For control or suppression of emerged weeds between rows after crop establishment. • Add either: 1) A non ionic surfactant containing 75% or more surface active agent at 0.25% v/v (2 pt per 100 gal), of the finished spray volume for ground applications, ***OR*** 2) Crop Oil Concentrate (non-phytotoxic) containing 15-20% approved emulsifier, at 1.0% v/v (1 gal per 100 gal) of the finished spray volume.

Crop	Maximum Number of Applications	Use Pattern	Gramoxone SL 2.0 Rate/Acre	Minimum Total Spray per Acre	Grazing or Preharvest Interval	Directions
VEGETABLES Cucumber Melons Pumpkin Squash For Use Only in the State of Hawaii	3	Directed/Shielded Spray	1.9 pt	Ground: 20 gal	8 days	**Restrictions** • Do not spray in high wind favoring drift into the crop. • Do not use on soils with less than 5% clay. • Do not apply after first bloom and within eight (8) days of harvest. • Do not harvest within eight (8) days of application. • Do not allow animals to graze in treated areas. • DO NOT apply this product through any type of irrigation system. **Precautions** • For control or suppression of emerged weeds between rows after crop establishment. • Use properly configured precision spray equipment to avoid contact of spray with the crop. • Apply when weeds are 6" or less in height and actively growing. • Always use a high quality nonionic surfactant or a crop oil concentrate. • Use even flat fan tips at 20 to 30 psi pressure at the nozzle, or use twin even flat spray or hollow cone spray tips at 30 psi pressure at the nozzle. Do not use tips that require higher operating pressures making spray droplets susceptible to drift. Do not use tips that produce large droplets as performance will be reduced. • Do not allow spray to contact green stems or foliage, as injury may result. • Avoid excessive speed as it may cause spray to contact the crop when the boom bounces.

Crop	Maximum Number of Applications	Use Pattern	Gramoxone SL 2.0 Rate/Acre	Minimum Total Spray per Acre	Grazing or Preharvest Interval	Directions
VEGETABLES Cucumber Melons Pumpkin Squash For Use Only in the State of New Jersey	3	Directed/Shielded Spray	1.95 pt	Ground: 20 gal	14 days	**Restrictions** • Apply when weeds are 6" or less in height and actively growing. • Do not exceed 30 psi nozzle pressure or spray under conditions which may cause excessive drift. • Do not allow spray to contact green stems or foliage, as injury may result. • Do not use on soils with less than 5% clay. • Do not allow animals to graze in treated areas. • Do not harvest within 14 days after application. • Do not apply after bloom. • Do not apply this product through any type of irrigation system. **Precautions** • For control or suppression of emerged weeds between rows after crop establishment. • Use precision directed spray equipment adjusted to prevent spray contact with crop plants. • Add either: 1) A non-ionic surfactant containing 75% or more surface active agent at 0.25% v/v (2 pt per 100 gal), of the finished spray volume for ground applications, ***OR*** 2) Crop Oil Concentrate (non-phytotoxic) containing 15-20% approved emulsifier, at 1.0% v/v (1 gal per 100 gal) of the finished spray volume.

Crop	Maximum Number of Applications	Use Pattern	Gramoxone SL 2.0 Rate/Acre	Minimum Total Spray per Acre	Grazing or Preharvest Interval	Directions
VEGETABLES Melons For Use Only in the State of Florida	3	Postemergence Directed Spray	1.9-3.75 pt	Ground: 40 gal	-	**Restrictions** • Add a nonionic surfactant at 16 to 32 fl oz per 100 gal of spray mix. • Do not allow animals to graze in treated areas. • DO NOT apply this product through any type of irrigation system. **Precautions** • For kill of emerged annual weeds and for top kill and suppression of emerged perennial weeds. • Apply when weeds are succulent and weed growth is less than 6", larger weeds are less affected and may not be controlled. • Do not allow spray to contact melon plants as injury or excessive residue may result. • Apply with conventional ground equipment directing spray between the rows and use shields to prevent spray contact with crop plants. • Weeds and grasses emerging after application will not be controlled.
VEGETABLES Cabbage Cucumber Melons Squash For Use Only in the State of Ohio	3	Directed Spray	2.25 pt	Ground: 20 gal	-	**Restrictions** • Do not exceed 30 psi nozzle pressure or spray under conditions which may cause excessive drift. • Do not use on soils with less than 5% clay. • Do not allow animals to graze in treated areas. • Apply when weeds are succulent and weed growth is less than 6". • Always use a high quality non-ionic surfactant. • DO NOT allow spray to contact green stems or foliage, as injury may result. • DO NOT apply this product through any type of irrigation system. **Precautions** • For control or suppression of emerged weeds between rows after crop establishment. • Use precision directed spray equipment

Crop	Maximum Number of Applications	Use Pattern	Gramoxone SL 2.0 Rate/Acre	Minimum Total Spray per Acre	Grazing or Preharvest Interval	Directions
						adjusted to prevent spray contact with crop plants.
VEGETABLES Cabbage Lettuce For Use Only in the State of Florida	3	Directed Spray	1.2-1.9 pt	Ground: 40 gal	-	**Restrictions** • Apply when weeds and grasses are succulent and weed growth is 1 to 6 inches high. • Do not allow spray to contact crop as injury or excessive residues may result. • Outer leaves should be stripped at the time of harvest. • Do not allow animals to graze in treated areas. • Do not apply where Gramoxone SL 2.0 (or other paraquat containing product) has been used as a preplant preemergence spray. • DO NOT apply this product through any type of irrigation system. **Precautions** • For postemergence directed spray - shielded application to control weeds in row middles in cabbage (including tight head Chinese cabbage) and lettuce. • Apply with conventional ground equipment directing spray between the rows and using shields to prevent spray contact with crop plants. • Weeds emerging after application will not be controlled. • For cabbage, add either: 1) a nonionic surfactant at 0.25% v/v (or 32 fl oz) per 100 gal of spray mix, ***OR*** 2) a nonphytotoxic crop oil concentrate containing 15 to 20% approved emulsifier, at 1.0% v/v (1 gal per 100 gal) of the finished spray volume. • For lettuce, add a nonionic surfactant at 0.25% v/v (or 32 fl oz) per 100 gal of spray mix.

Crop	Maximum Number of Applications	Use Pattern	Gramoxone SL 2.0 Rate/Acre	Minimum Total Spray per Acre	Grazing or Preharvest Interval	Directions
VEGETABLES (vine desiccation) For Use Only in the States of Delaware and Georgia	2	Broadcast Spray Post-Harvest	2.25-3 pt	Ground: 10 gal		**Restrictions** • Do not graze livestock in treated area. • Do not apply this product through any type of irrigation system. **Precautions** • For post-harvest desiccation of vegetable vines. • Apply as a broadcast spray over-the-top of plants following harvest. • Add a nonionic surfactant at 1 qt. per 100 gal of spray mix.
WHEAT (salvage treatment for suppression of volunteer rye and downy brome) For Use Only in the State of Idaho	1	Postemergence Broadcast (salvage)	8-12 fl oz for vol. Rye 12 fl oz for downy brome	Ground: 20 gal Air: 5 gal		**Restrictions** • Apply after wheat plants have developed five tillers or six inches in height in the spring and prior to emergence of the head from the boot. • Do not graze treated fields or feed treated forage or straw to livestock. • This salvage spray should only be used when wheat production is in danger of being severely reduced by rye or downy brome (cheatgrass) competition and where reseeding is the only other alternative. • Do not apply this product through any type of irrigation system. **Precautions** • For the suppression of volunteer rye and downy brome (cheatgrass) in wheat where weeds are present in sufficient quantities to cause reduction in wheat yield and quality. • Failure to comply with these instructions increases the chance of crop injury and may result in illegal Gramoxone SL 2.0 residue in the grain. • Yield reductions may occur at any stage of growth. • Add a nonionic surfactant containing at least 50% surface active ingredient at 1-2 pt per 100 gal of dilute spray. • Yield reductions can be expected in exchange for improved grain quality.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal.

Pesticide Storage

Store at temperatures above 32°F. Store tightly closed in original container and in a locked place away from children and animals.

Pesticide Disposal

Pesticides wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

Container Handling (less than 120 gallons)

Nonrefillable container: Do not reuse or refill this container. Pressure rinse container promptly after emptying. Pressure rinse as follows: Empty the remaining contents into application equipment or a mix tank using the closed transfer system. While maintaining the closed system connection of this container to the application equipment or mix-tank, activate the pressure rinsing system on the closed system, and rinse at about 40 PSI for at least 45 seconds. Once pressure rinse has been stopped, allow container to drain for additional 30 seconds into the application equipment or mix-tank. Then offer for recycling if available or reconditioning if appropriate or puncture and dispose of in a sanitary landfill or by incineration.

Prior to offering for recycling, but only after the container has been emptied and pressure rinsed, the closed system valve must be removed from the product container. Do Not remove this valve until after the product container has been rinsed and drained as described above. To remove closed system valve, use a mechanical device such as a strap wrench or adjustable pliers to turn the valve counter clockwise until the locking mechanism is released. The closed system valve is removed from the product container by unscrewing the valve in a counter clockwise direction until free from the product container. The closed system valve is not recyclable and should be discarded.

Container Handling (120 gallons or greater)

Refillable container. Refill this container with pesticide only. Do not reuse this container for any other purpose. Cleaning the container before final disposal is the

responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the person refilling. To clean container before final disposal, empty the remaining contents from this container into application equipment or mix tank. Fill the container about 10 percent full with water. Agitate vigorously or recirculate water with the pump for 2 minutes. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this rinsing procedure two more times. Then offer for recycling if available or puncture and dispose of in a sanitary landfill, or by incineration, or by other procedures approved by state and local authorities.

For help with any spill, leak or fire involving this material, **call 1-800-888-8372**.

CONTAINER IS NOT SAFE FOR FOOD, FEED OR DRINKING WATER.

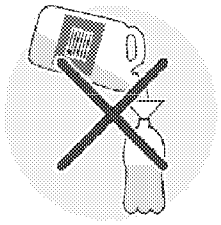
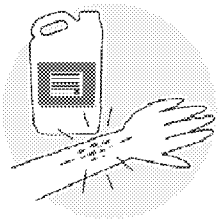
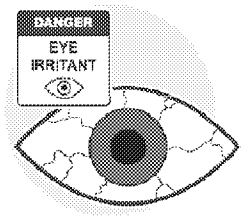
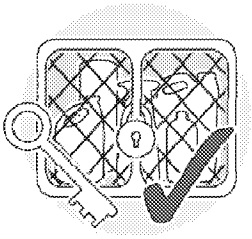
For non-emergency (e.g., current product information), call
Syngenta Crop Protection at 1-800-334-9481.

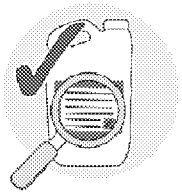
Manufactured for:
Syngenta Crop Protection, LLC
P. O. Box 18300
Greensboro, North Carolina 27419-8300

GRAMOXONE SL 2.0 1431 MAS 1118 AMEND-E 0319 -SV 10/23/2019
000100-01431.20190329E.GRAMOXONE_SL_2.0-AMEND-MAR2019-CL.PDF

PRODUCT CAP STICKER

[PPSR Sticker]
Product Package Safety Requirements

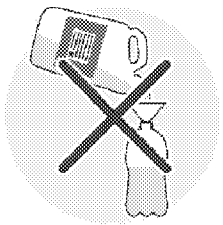
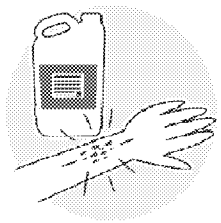
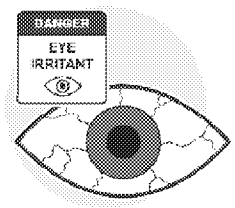
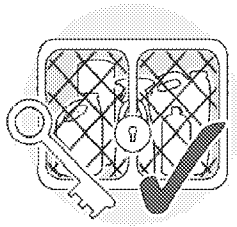
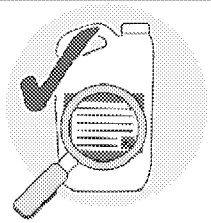
NEVER TRANSFER THIS PRODUCT INTO FOOD OR BEVERAGE CONTAINERS OR CONTAINERS NOT EXPLICITLY INTENDED FOR PESTICIDES.	**NUNCA TRANSFIERA ESTE PRODUCTO A RECIPIENTES PARA COMIDA O DE BEBIDAS O RECIPIENTES NO EXPLÍCITAMENTE PREVISTOS PARA PLAGUICIDAS**	
ONE SIP CAN KILL.	**UN SORBO PUEDE CAUSAR LA MUERTE.**	
CONTACT WITH SKIN MAY RESULT IN POISONING.	**EL CONTACTO CON LA PIEL PUEDE CAUSAR ENVENENAMIENTO.**	
EXPOSURE TO EYES MAY CAUSE SUBSTANTIAL EYE INJURY.	**EXPOSICIÓN A LOS OJOS PUEDE CAUSAR LESIONES SUSTANCIALES EN LOS OJOS.**	
PARAQUAT SHOULD ALWAYS BE STORED TIGHTLY CLOSED IN ORIGINAL CONTAINER, AND IN A LOCKED PLACE AWAY FROM CHILDREN AND ANIMALS.	**EL PARAQUAT DEBE ALMACENARSE SIEMPRE CERRADO EN SU RECIPIENTE ORIGINAL, Y EN UN LUGAR CERRADO, ALEJADO DE NIÑOS Y ANIMALES.**	

READ ENTIRE LABEL PRIOR TO USING THIS PRODUCT.	**LEA LA ETIQUETA COMPLETA ANTES DE USAR ESTE PRODUCTO.**	

[Counter Card]

Gramoxone SL 2.0 contains the active ingredient paraquat dichloride (paraquat). People have died from accidentally drinking paraquat containing products that had been transferred into a beverage container, such as a water bottle or other drink bottle. It is also highly corrosive and can cause severe skin and eye damage including 3rd degree burns. Inhalation exposure may result in serious respiratory effects. FATAL if swallowed or inhaled.

Proper storage and handling

					
NEVER TRANSFER GRAMOXONE SL 2.0 INTO FOOD OR BEVERAGE CONTAINERS OR CONTAINERS NOT EXPLICITLY INTENDED FOR GRAMOXONE SL 2.0.	ONE SIP CAN KILL.	CONTACT WITH SKIN MAY RESULT IN POISONING.	EXPOSURE TO EYES MAY CAUSE SUBSTANTIAL EYE INJURY.	PARAQUAT SHOULD ALWAYS BE STORED TIGHTLY CLOSED IN ORIGINAL CONTAINER, AND IN A LOCKED PLACE AWAY FROM CHILDREN AND ANIMALS.	READ ENTIRE LABEL PRIOR TO USING THIS PRODUCT.

DISREGARDING LABEL DIRECTIONS IS A VIOLATION OF FEDERAL LAW AND IS PUNISHABLE AS SUCH.

Requirements for Use

- **TO PREVENT SEVERE INJURY OR DEATH, FOLLOW ALL LABEL RQUIREMENTS.**
- **TO BE USED BY CERTIFIED APPLICATORS ONLY – NOT TO BE USED BY NONCERTIFIED PERSONS WORKING UNDER THE SUPERVISION OF A CERTIFIED APPLICATOR.**
- Applicators and other handlers (other than Mixers and Loaders) must wear long-sleeve shirt and long pants, shoes plus socks, protective eyewear, chemical-resistant gloves (made of: barrier laminate, butyl rubber ≥ 14 mils, nitrile rubber ≥ 14 mils,

neoprene rubber ≥ 14 mils, natural rubber ≥ 14 mils, polyethylene, polyvinyl chloride (PVC) ≥ 14 mils, or Viton® ≥ 14 mils), and a NIOSH-approved particulate respirator with any N, R, or P filter, NIOSH approval number prefix TC-84A, or a NIOSH-approved powered air purifying respirator with an HE filter with NIOSH approval number prefix TC-21C..

- Mixers and Loaders must wear long-sleeve shirt and long pants, shoes plus socks, chemical-resistant gloves (made of: barrier laminate, butyl rubber ≥ 14 mils, nitrile rubber ≥ 14 mils, neoprene rubber ≥ 14 mils, natural rubber ≥ 14 mils, polyethylene, polyvinyl chloride (PVC) ≥ 14 mils, or Viton® ≥ 14 mils), chemical-resistant apron, face shield, and a NIOSH-approved particulate respirator with any N, R, or P filter, NIOSH approval number prefix TC-84A, or a NIOSH-approved powered air purifying respirator with an HE filter with NIOSH approval number prefix TC-21C.Remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Remove and wash contaminated clothing before wearing again.
- Discard clothing and other absorbent materials that have been drenched or heavily contaminated with paraquat. Do not reuse them. Follow the manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washing PPE exists, use detergent and hot water.
- Keep and wash PPE separately from other laundry.
- Refer to the product label for more information.
- **DO NOT** tank mix this product with any pest control products other than those listed on the Gramoxone SL 2.0 label. Gramoxone SL 2.0 is compatible with the tank mix partners listed on this label.

First Aid

- **If swallowed: SPEED IS ESSENTIAL. Immediate medical attention is required.** Administer either activated charcoal (100g for adults or 2g/kg body weight in children) or Fuller's Earth (15% solution; 1 liter for adults or 15ml/kg body weight in children). **DO NOT USE SUPPLEMENTAL OXYGEN.** Call a poison control center or doctor **IMMEDIATELY** for treatment advice. Do not give anything by mouth to an unconscious person.
- **If inhaled:** Move person to fresh air. The odor of this product is from the alerting agent, which has been added, not from the paraquat. If person is not breathing, call 911 or an ambulance. Call a poison control center or doctor for further treatment advice.
- **If in eyes:** Hold eye open and rinse slowly and gently with clean water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.
- **If on skin or clothing:** Take off contaminated clothing. **IMMEDIATELY** wash the affected area with soap and water and rinse for 15-20 minutes. Prolonged contact will cause severe irritation. Contact with irritated skin or a cut or repeated contact with intact skin may result in poisoning. **GET MEDICAL ATTENTION.** Call a poison control center or doctor for treatment advice.
- Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

Please refer to the product label for further information.

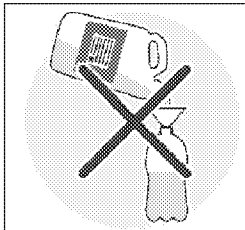
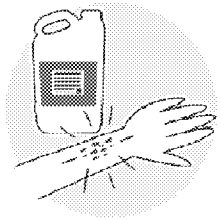
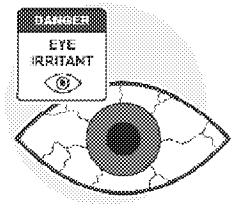
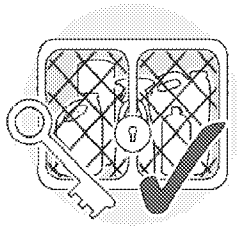
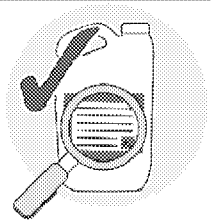
For 24-hour medical emergency assistance (human or animal) or chemical emergency assistance (spill, leak, fire or accident) call 1-800-888-8372.

For non-emergency call 1-800-334-9481.

[Tarjeta de mostrador]

Gramoxone SL 2.0 contiene el ingrediente activo dicloruro de paraquat (paraquat). Hay personas que han muerto por beber accidentalmente productos que contienen paraquat que se habían transferido a un recipiente de bebidas, como una botella de agua u otra botella de bebida. También es altamente corrosivo y puede causar daños graves en la piel y los ojos, incluyendo quemaduras de tercer grado. La exposición por inhalación puede provocar efectos respiratorios graves. FATAL si se ingiere o inhala.

Almacenamiento y manejo adecuados

					
NUNCA TRANSFIERA ESTE PRODUCTO A CONTENEDORES O ENVASES DE ALIMENTOS O BEBIDAS NO DESTINADOS EXPLÍCITAMENTE PARA PLAGUICIDAS.	**UN SORBO PUEDE CAUSAR LA MUERTE.**	**EL CONTACTO CON LA PIEL PUEDE RESULTAR EN ENVENENAMIENTO.**	**LA EXPOSICIÓN A LOS OJOS PUEDE CAUSAR LESIONES GRAVES A LOS OJOS.**	**EL PARAQUAT DEBE ALMACENARSE SIEMPRE CERRADO EN SU RECIPIENTE ORIGINAL, Y EN UN LUGAR CERRADO, ALEJADO DE NIÑOS Y ANIMALES.**	**LEA LA ETIQUETA COMPLETA ANTES DE USAR ESTE PRODUCTO.**

NO SEGUIR LAS INDICACIONES DE LA ETIQUETA REPRESENTA UNA INFRACCIÓN DE LA LEY FEDERAL Y ES PENADO COMO TAL.

Requisitos de uso

- **PARA EVITAR LESIONES GRAVES O LA MUERTE, SIGA TODOS LOS REQUERIMIENTOS DE LA ETIQUETA.**
- **PARA SER UTILIZADO SOLO POR APLICADORES CERTIFICADOS: NO DEBE SER UTILIZADO POR PERSONAS NO CERTIFICADAS QUE TRABAJAN BAJO LA SUPERVISIÓN DE UN APLICADOR CERTIFICADO.**

- Los aplicadores y otras personas que lo manipulen (que no sean mezcladores y cargadores) deben usar camisa de manga larga y pantalones largos, zapatos con calcetines, gafas protectoras, guantes resistentes a productos químicos (hechos de: barrera laminada, goma de butilo ≥ 14 milésimas de pulgada, goma de nitrilo≥ 14 milésimas de pulgada, goma de neopreno ≥ 14 milésimas de pulgada, goma natural ≥ 14 milésimas de pulgada, polietileno, cloruro de polivinilo (PVC) ≥ 14 milésimas de pulgada o Viton® ≥ 14 milésimas de pulgada), y un respirador de partículas aprobado por NIOSH para polvo/niebla con cualquier filtro N, R o P, prefijo de número de aprobación NIOSH TC-84A, o un respirador purificador de aire con aprobación NIOSH con filtro HE con prefijo de número de aprobación NIOSH TC-21C.
- Los mezcladores y cargadores deben utilizar camisa de manga larga y pantalones largos, zapatos con calcetines, guantes resistentes a productos químicos (hechos de: barrera laminada, goma de butilo ≥ 14 milésimas de pulgada, goma de nitrilo≥ 14 milésimas de pulgada, goma de neopreno ≥ 14 milésimas de pulgada, goma natural ≥ 14 milésimas de pulgada, polietileno, cloruro de polivinilo (PVC) ≥ 14 milésimas de pulgada o Viton® ≥ 14 milésimas de pulgada), un delantal resistente a productos químicos, protector facial y un respirador de partículas aprobado por NIOSH para polvo/niebla con cualquier filtro N, R o P, prefijo de número de aprobación NIOSH TC-84A, o un respirador purificador de aire con aprobación NIOSH con filtro HE con prefijo de número de aprobación NIOSH TC-21C.
- Quítese la ropa o equipo de protección personal inmediatamente si se impregna de pesticida. Luego lávese bien y póngase ropa limpia.
- Retire y lave la ropa contaminada antes de volver a usarla.
- Deseche la ropa y otros materiales absorbentes empapados o fuertemente contaminados con paraquat. No los reutilice. Siga las instrucciones del fabricante para limpiar y mantener el EPP. Si no existen tales instrucciones para lavar el EPP, use detergente y agua caliente.
- Mantenga y lave el EPP por separado de la otra ropa.
- Consulte la etiqueta del producto para más información.
- **NO** mezcle en tanque este producto con ningún otro producto para el control de plagas que no esté incluido en la etiqueta Gramoxone SL 2.0. Gramoxone SL 2.0 es compatible con los socios de mezcla de tanque listados en esta etiqueta.

Primeros auxilios

- **Si se ingiere: LA RAPIDEZ ES ESENCIAL. Se requiere atención médica inmediata.** Administre carbón activado (100 g para adultos o 2 g/kg de peso corporal en niños) o Fuller's Earth (solución al 15 %, 1 litro para adultos o 15 ml/kg de peso corporal en niños). **NO USE OXÍGENO COMPLEMENTARIO.** Llame a un centro de control de envenenamiento o a un médico **INMEDIATAMENTE** para recibir asesoramiento sobre el tratamiento. No administre nada por vía oral a una persona inconsciente.
- **Si se inhala:** Mueva a la persona al aire fresco. El olor de este producto proviene del agente de alerta, que se ha agregado, no del paraquat. Si la persona no respira, llame al 911 o a una ambulancia. Para recibir instrucciones adicionales respecto al tratamiento a seguir, llame a un médico o a un centro de control de envenenamiento.

- **Si entra en contacto con los ojos:** Mantenga los ojos abiertos y enjuague lenta y suavemente con agua limpia durante 15-20 minutos. Si el afectado usa lentes de contacto, espere cinco minutos antes de retirarlos; entonces, continúe enjuagando el ojo. Llame a un médico o a un centro de control de envenenamiento para recibir instrucciones respecto al tratamiento a seguir.
- **Si entra en contacto con la piel o la ropa:** Qítese la ropa contaminada. Lave **INMEDIATAMENTE** la zona afectada con agua y jabón y enjuague durante 15-20 minutos. El contacto prolongado causará irritación grave. El contacto con la piel irritada o un corte o contacto repetido con la piel intacta puede provocar intoxicación. **OBTENGA ATENCIÓN MÉDICA.** Llame a un médico o a un centro de control de envenenamiento para recibir instrucciones respecto al tratamiento a seguir.
- Tenga a la mano el envase del producto o su etiqueta cuando llame al centro de control de envenenamiento, al médico o al buscar tratamiento.

Consulte la etiqueta del producto para obtener más información.

Para asistencia de emergencia médica las 24 horas (humanos o animales) o asistencia de emergencia química (derrames, fugas, incendios o accidentes) llame al 1-800-888-8372.

Para casos que no son de emergencia llame al 1-800-334-9481.

Message

From: Dixon Monty USGR [monty.dixon@syngenta.com]
Sent: 8/7/2019 10:16:14 PM
To: Mannix, Marianne [Mannix.Marianne@epa.gov]
Subject: RE: Perhaps Thursday?

Hi Marianne,

I have to be out of the office in the morning, perhaps I can touch base with you at the end of the call on Friday? Just want to follow up a bit on the suggested changes to the training you provided earlier.

Hope you have a great evening,

Monty

From: Mannix, Marianne [mailto:Mannix.Marianne@epa.gov]
Sent: Wednesday, August 7, 2019 5:57 PM
To: Dixon Monty USGR <monty.dixon@syngenta.com>
Subject: RE: Perhaps Thursday?

Hi Monty – sorry I meant to call you today… I'll give you a call in the morning.

Marianne A. Mannix
Office of Pesticide Programs
U.S. Environmental Protection Agency
(703) 347-0275

From: Dixon Monty USGR <monty.dixon@syngenta.com>
Sent: Tuesday, August 06, 2019 2:22 PM
To: Mannix, Marianne <Mannix.Marianne@epa.gov>
Subject: RE: Perhaps Thursday?

Hi Marianne,

Thanks. Do you have time now for brief (~2 min) call?

Monty

From: Mannix, Marianne [mailto:Mannix.Marianne@epa.gov]
Sent: Tuesday, August 6, 2019 2:19 PM
To: Dixon Monty USGR <monty.dixon@syngenta.com>
Subject: RE: Perhaps Thursday?

Thanks Monty. I'll discuss with Nancy. We can use my conference line.

Call in #: **Ex. 6 Personal Privacy (PP)**
Conference ID: **Ex. 6 Personal Privacy (PP)**

Marianne A. Mannix
Office of Pesticide Programs
U.S. Environmental Protection Agency
(703) 347-0275

From: Dixon Monty USGR <monty.dixon@syngenta.com>
Sent: Tuesday, August 06, 2019 2:11 PM
To: Mannix, Marianne <Mannix.Marianne@epa.gov>
Subject: RE: Perhaps Thursday?

Hi Marianne,

Here are a few questions we would like to touch base on during our call Friday. I am hopeful that the call won't take too long. I am happy to provide a call in number unless you would prefer to use yours.

Thanks
Monty

1. Scenario: Bulk product purchased and delivered prior to the phase 2 Nov 14th 2019 label implementation date. The active label is the current label and not the phase II label. No additional product has been placed into the tank through the Nov. 14th 2019 date.
    - Will customers be required to re-label their bulk tanks by Nov. 14th, even if product in tank received prior to Nov. 14th?
    - Product repacked out of tank filled PRIOR to Nov. 14th will be distributed with the labeling at time product was delivered (non-phase II label). For product repacked out of tank filled AFTER Nov. 14th , which label should be used: the label of the product when delivered or the Nov 14th phase II label even if not new product has been added to the bulk tank?
    - What labels/stickers do they want on the stationary bulk tanks? (ie., Spanish/English pictorial, product label, on sip can kill, etc.)

2. For portable bulk packages >120 gallons such as 275 gallon totes. Clarifications on how "counter cards", PPSR, and one sip stickers are intended to be distributed?

3. Need clarification on training requirements for warehouse / distributor personnel that fill mini bulk totes
    a. Your previous on explanation why bulk repackagers don't have to be certified applicators was stated nicely. We have received and anticipate will received additional questions on this. I believe your intention is to add this information to the paraquat FAQs. We would like to be able to have something on file to provide to states, retailers, distributors who ask this question. Would this be possible or would the best path be directing them to the FAQs?

From: Dixon Monty USGR
Sent: Monday, August 5, 2019 2:27 PM
To: Mannix, Marianne <Mannix.Marianne@epa.gov>
Subject: RE: Perhaps Thursday?

Hi Marianne,

Thanks that will be great. I will try to have some questions to you by mid-day tomorrow.

Take Care,

Monty

From: Mannix, Marianne [mailto:Mannix.Marianne@epa.gov]
Sent: Monday, August 5, 2019 2:03 PM
To: Dixon Monty USGR <monty.dixon@syngenta.com>
Subject: RE: Perhaps Thursday?

Hi Monty,

Sure – 2:30 works. If possible, could you get a list of questions to me in advance? Nancy is on leave starting Thursday afternoon, but I could run them by her earlier in the week and hopefully have some responses for you when we meet.

Thanks,
Marianne

Marianne A. Mannix
Office of Pesticide Programs
U.S. Environmental Protection Agency
(703) 347-0275

From: Dixon Monty USGR <monty.dixon@syngenta.com>
Sent: Monday, August 05, 2019 1:57 PM
To: Mannix, Marianne <Mannix.Marianne@epa.gov>
Subject: RE: Perhaps Thursday?

Hi Marianne,

Our folks are free Friday afternoon. Would 2-230/245 work for you? If not, I think we can make any time after 1 work.

Thanks
Monty

From: Mannix, Marianne [mailto:Mannix.Marianne@epa.gov]
Sent: Monday, August 5, 2019 10:34 AM
To: Dixon Monty USGR <monty.dixon@syngenta.com>
Subject: RE: Perhaps Thursday?

Hi Monty,

Friday would work better for us, if possible.

Marianne A. Mannix
Office of Pesticide Programs
U.S. Environmental Protection Agency
(703) 347-0275

From: Dixon Monty USGR <monty.dixon@syngenta.com>
Sent: Monday, August 05, 2019 9:58 AM
To: Mannix, Marianne <Mannix.Marianne@epa.gov>
Subject: Perhaps Thursday?

Hi Marianne,

I just reached out to our Team and it appears that tomorrow at one is also booked for them. I have asked them to put together some times that would work and I will send them to you shortly.

Thanks,

Monty

Get Outlook for iOS

Message

From: Moseley Carroll USGR [carroll.moseley@syngenta.com]
Sent: 8/7/2019 6:02:38 PM
To: Laird Patsy USGR [patsy.laird@syngenta.com]; Jones, Patrick [patrick.jones@ncagr.gov]; Mannix, Marianne [Mannix.Marianne@epa.gov]
Subject: RE: Paraquat Training

That would be great – thanks Patsy!
Carroll

From: Laird Patsy USGR
Sent: Wednesday, August 7, 2019 2:01 PM
To: Jones, Patrick <patrick.jones@ncagr.gov>; Mannix, Marianne <Mannix.Marianne@epa.gov>; Moseley Carroll USGR <carroll.moseley@syngenta.com>
Subject: RE: Paraquat Training

Patrick,

I will be able to talk about the paraquat training updates at the AAPCO meeting. It seems like there will be a lot to talk about.

Kind Regards,
Patsy
Patsy Dudash Laird
Stewardship Manager
Syngenta Crop Protection, LLC
Ex. 6 Personal Privacy (PP)
336-632-5927 (office)

From: Jones, Patrick [mailto:patrick.jones@ncagr.gov]
Sent: Wednesday, August 7, 2019 1:37 PM
To: Mannix, Marianne <Mannix.Marianne@epa.gov>; Laird Patsy USGR <patsy.laird@syngenta.com>; Moseley Carroll USGR <carroll.moseley@syngenta.com>
Subject: Paraquat Training

Hello everyone – I am reaching out again, to see if you would be able to present at the AAPCO 2020 Conference on the paraquat training updates since last years AAPCO Conference. Your session last year was a huge success and received great comments and ratings. I know there have been significant updates and progress in the in-person training areas. We would likely schedule the presentation for Tuesday afternoon, March 10, 20120. If there is someone else that we need to add – please let me know. Thank you for your consideration and your devotion to this project! Take care and I hope you enjoy the rest of your summer!!

Sincerely, Patrick Jones

Deputy Director of Pesticide Programs
North Carolina Dept. of Agriculture and Consumer Services
Structural Pest Control and Pesticides Division
1090 Mail Service Center

Raleigh, NC 27699-1090
Direct Dial (919) 857-4143
Ex. 6 Personal Privacy (PP)

got to be NC AG POLLINATORS

Message

From: Laird Patsy USGR [patsy.laird@syngenta.com]
Sent: 8/7/2019 6:00:56 PM
To: Jones, Patrick [patrick.jones@ncagr.gov]; Mannix, Marianne [Mannix.Marianne@epa.gov]; Moseley Carroll USGR [carroll.moseley@syngenta.com]
Subject: RE: Paraquat Training

Patrick,

I will be able to talk about the paraquat training updates at the AAPCO meeting. It seems like there will be a lot to talk about.

Kind Regards,
Patsy
Patsy Dudash Laird
Stewardship Manager
Syngenta Crop Protection, LLC
Ex. 6 Personal Privacy (PP)
336-632-5927 (office)

From: Jones, Patrick [mailto:patrick.jones@ncagr.gov]
Sent: Wednesday, August 7, 2019 1:37 PM
To: Mannix, Marianne <Mannix.Marianne@epa.gov>; Laird Patsy USGR <patsy.laird@syngenta.com>; Moseley Carroll USGR <carroll.moseley@syngenta.com>
Subject: Paraquat Training

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Sincerely, Patrick Jones

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Raleigh, NC 27699-1090
Direct Dial (919) 857-4143
Ex. 6 Personal Privacy (PP)

Message

From: Dixon Monty USGR [monty.dixon@syngenta.com]
Sent: 8/6/2019 6:11:13 PM
To: Mannix, Marianne [Mannix.Marianne@epa.gov]
Subject: RE: Perhaps Thursday?

Hi Marianne,

Here are a few questions we would like to touch base on during our call Friday. I am hopeful that the call won't take too long. I am happy to provide a call in number unless you would prefer to use yours.

Thanks
Monty

1. Scenario: Bulk product purchased and delivered prior to the phase 2 Nov 14th 2019 label implementation date. The active label is the current label and not the phase II label. No additional product has been placed into the tank through the Nov. 14th 2019 date.
    - Will customers be required to re-label their bulk tanks by Nov. 14th, even if product in tank received prior to Nov. 14th?
    - Product repacked out of tank filled PRIOR to Nov. 14th will be distributed with the labeling at time product was delivered (non-phase II label). For product repacked out of tank filled AFTER Nov. 14th , which label should be used: the label of the product when delivered or the Nov 14th phase II label even if not new product has been added to the bulk tank?
    - What labels/stickers do they want on the stationary bulk tanks? (ie., Spanish/English pictorial, product label, on sip can kill, etc.)

2. For portable bulk packages >120 gallons such as 275 gallon totes. Clarifications on how "counter cards", PPSR, and one sip stickers are intended to be distributed?

3. Need clarification on training requirements for warehouse / distributor personnel that fill mini bulk totes
    a. Your previous on explanation why bulk repackagers don't have to be certified applicators was stated nicely. We have received and anticipate will received additional questions on this. I believe your intention is to add this information to the paraquat FAQs. We would like to be able to have something on file to provide to states, retailers, distributors who ask this question. Would this be possible or would the best path be directing them to the FAQs?

From: Dixon Monty USGR
Sent: Monday, August 5, 2019 2:27 PM
To: Mannix, Marianne <Mannix.Marianne@epa.gov>
Subject: RE: Perhaps Thursday?

Hi Marianne,

Thanks that will be great. I will try to have some questions to you by mid-day tomorrow.

Take Care,

Monty

From: Mannix, Marianne [mailto:Mannix.Marianne@epa.gov]
Sent: Monday, August 5, 2019 2:03 PM
To: Dixon Monty USGR <monty.dixon@syngenta.com>
Subject: RE: Perhaps Thursday?

Hi Monty,

Sure – 2:30 works. If possible, could you get a list of questions to me in advance? Nancy is on leave starting Thursday afternoon, but I could run them by her earlier in the week and hopefully have some responses for you when we meet.

Thanks,
Marianne

Marianne A. Mannix
Office of Pesticide Programs
U.S. Environmental Protection Agency
(703) 347-0275

From: Dixon Monty USGR <monty.dixon@syngenta.com>
Sent: Monday, August 05, 2019 1:57 PM
To: Mannix, Marianne <Mannix.Marianne@epa.gov>
Subject: RE: Perhaps Thursday?

Hi Marianne,

Our folks are free Friday afternoon. Would 2-230/245 work for you? If not, I think we can make any time after 1 work.

Thanks
Monty

From: Mannix, Marianne [mailto:Mannix.Marianne@epa.gov]
Sent: Monday, August 5, 2019 10:34 AM
To: Dixon Monty USGR <monty.dixon@syngenta.com>
Subject: RE: Perhaps Thursday?

Hi Monty,

Friday would work better for us, if possible.

Marianne A. Mannix
Office of Pesticide Programs
U.S. Environmental Protection Agency
(703) 347-0275

From: Dixon Monty USGR <monty.dixon@syngenta.com>
Sent: Monday, August 05, 2019 9:58 AM
To: Mannix, Marianne <Mannix.Marianne@epa.gov>
Subject: Perhaps Thursday?

Hi Marianne,

I just reached out to our Team and it appears that tomorrow at one is also booked for them. I have asked them to put together some times that would work and I will send them to you shortly.

Thanks,

Monty

Get Outlook for iOS

Message

From: Dixon Monty USGR [monty.dixon@syngenta.com]
Sent: 7/15/2019 6:37:40 PM
To: Mannix, Marianne [Mannix.Marianne@epa.gov]
Subject: Paraquat Training Website

Hi Marianne,

Just keeping you in the loop....I have requested a meeting with Patsy Laird and Tom Smith later this week to inquire about the possibility of modifying the training and adding cc to this current version if possible.

I will let you know what they say.

With Best Regards,
Monty

Montague (Monty) Dixon
Telephone: 336.632.7055
Cell Phone: Ex. 6 Personal Privacy (PP)

Message

From: Dixon Monty USGR [monty.dixon@syngenta.com]
Sent: 6/20/2019 4:43:30 PM
To: Mannix, Marianne [Mannix.Marianne@epa.gov]
Subject: Courtesy Copy of 6(A)2 submission related to paraquat
Attachments: FINAL EPA Letter - Paraquat H-A - Man in Louisiana - 1-56908708 - 062019....pdf

Dear Marianne,

Please find a courtesy copy of notification under FIFRA 6(a)(2) of a reported death from an exposure of an individual drinking from a soft drink bottle that is alleged to have contained a paraquat product. We were informed on June 14, 2019 that a caller contacted ProPharma concerning a dermal exposure event which is being reported separately. During the call, the caller also indicated knowledge of a 45 - 50 year old male individual with whom he was acquainted, who allegedly consumed the product stored in a soft drink bottle and passed away four days post-exposure. The product was reported to be Gramoxone, however this product identification has not been confirmed. The official date of this alleged death is unknown.

With Best Regards,

Monty

Montague (Monty) Dixon
Telephone: 336.632.7055
Cell Phone: Ex. 6 Personal Privacy (PP)

Montague Dixon
Team Lead Herbicides
Regulatory Affairs
(336) 632-7055

Syngenta Crop Protection, Inc.
P.O. Box 18300
Greensboro, NC 27419-8300
www.syngenta.com

syngenta

VIA FedEx®

June 20, 2019

Document Processing Desk [6(a)(2)]
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Document Processing Room – S-4900
One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

SUBJECT: SUBMISSION OF INFORMATION UNDER FIFRA 6(a)(2) - ALLEGED PARAQUAT INCIDENT IN LOUISIANA - SEVERITY H-A

In accordance with EPA's current interpretation of the reporting requirements of FIFRA Section 6(a)(2), Syngenta Crop Protection, LLC wishes to notify the Agency of a human death that allegedly occurred in Louisiana as a result of an unintentional ingestion of a product that may have contained paraquat.

On June 14, 2019, Syngenta was informed that a caller contacted ProPharma concerning a dermal exposure event which is being reported separately. In the course of the call, the caller also indicated knowledge of a 45 - 50 year old male individual with whom he was acquainted, who allegedly consumed the product stored in a soft drink bottle and passed away four days post-exposure. The product was reported to be Gramoxone, however this product identification has not been confirmed. The official date of this alleged death is unknown. All of the details concerning this alleged incident can be found in the attached report, provided by ProPharma.

Please contact me by email at monty.dixon@syngenta.com or by phone at 336-632-7055 if you have any questions regarding this submission.

Sincerely yours,

Montague Dixon
Team Lead Herbicides
Syngenta Crop Protection, LLC

Enclosure (1)

Message

From: Dixon Monty USGR [monty.dixon@syngenta.com]
Sent: 6/20/2019 1:33:45 PM
To: Rowland, Grant [Rowland.Grant@epa.gov]
CC: Mannix, Marianne [Mannix.Marianne@epa.gov]
Subject: 100-RALE Touching Base

Hi Grant,

Hope all is well. I would like to touch base on the pending action for 100-RALE (Gramoxone 3 LB Herbicide; alternate brand name Gramoxone SL 3.0). With the PRIA date approaching, I thought it would be good to ensure you have everything you need from us for this product.

This product, which we intend to launch this fall, will be distributed in full alignment with the requirements of the paraquat Human Health Mitigation Decision (HHMD) including the phase 3 requirement of only distributing in closed package/transfer systems for all non-bulk package sizes (<120 gallons). In addition to the closed system requirement, the proposed PPE requirements for this product still comply with the PPE requirements for all paraquat end-use products as established by the 1997 Paraquat Registration Eligibility Decision document (RED) and the February 12, 2001 letter from EPA to all paraquat registrants requiring the inclusion "A NIOSH-approved respirator with any N, R, P or HE filter". Accordingly, and as noted in our submission, the PPE requirements for 100-RALE are the same PPE requirements for the other currently registered 3 lb/gallon paraquat products with the notable exception of the inclusion of the closed system packaging.

Pleases note that there have been some mandatory language requirements that have were issued as part of the phase 3 activities of the HHMD which have recently occurred. We intend to include these 3 statements on the label and would be happy to send you a revised label with these now or as suggested in my earlier email, we could make these changes with any other label changes you would wish to see prior to label being stamped.

1. *[This product must only be removed from the original container with a closed transfer system. Any subsequent transfer of this product must utilize a closed transfer system. Any attempt to circumvent the closed transfer system is prohibited.]*
2. *This product may be only be applied with a backpack sprayer if the backpack equipment allows the product to be transferred into the sprayer from the original product container using a closed system as specified in the USE INSTRUCTIONS AND INFORMATION section of this label.*
3. *Tank mix compatibility testing (a.k.a., jar testing) is prohibited. Consult [registrant-supplied website] for a list of compatible tank mix products.*

To my knowledge,100-RALE will be the first closed system product for paraquat in the market place as the paraquat HHMD time for requiring closed systems is not anticipated to be mandated until fall of 2020. Being able to introduce 100-RALE this fall allows us to demonstrate both the feasibility and enhanced stewardship of the closed systems mandated by the paraquat HHMD. In order for us to be able to meet our intention to introduce this product this fall, it will be important to gain registration by the July 15, 2019 PRIA date for this action as well as the concurrently submitted secondary action on the Paraquat Concentrate ES (EPA Reg. No. 100-1067) to allow use of this product in the closed systems.

Please give me a call or email me if I can provide you with any additional information.

Thanks for your time and thoughts,

Monty

Message

From: Dixon Monty USGR [monty.dixon@syngenta.com]
Sent: 6/14/2019 6:57:55 PM
To: Rowland, Grant [Rowland.Grant@epa.gov]
CC: Mannix, Marianne [Mannix.Marianne@epa.gov]
Subject: RE: Name Change Requested for d EPA reg # 100-RALE

Hi Grant,

Small correction....new name will be Gramoxone SL 3.0 not Gramoxone 3SL.

Thanks,
Monty

From: Dixon Monty USGR
Sent: Friday, June 14, 2019 2:50 PM
To: Rowland, Grant <Rowland.Grant@epa.gov>
Cc: Marianne A. Mannix (Mannix.Marianne@epa.gov) <Mannix.Marianne@epa.gov>
Subject: Name Change Requested for d EPA reg # 100-RALE

Hi Grant,

Hope you are well and have great weekend ahead.

I have a question how best to change the product name for this pending action (EPA Reg. No. 100-RALE, Decision number: 545748). The pending name for this product is Gramoxone 3LB. Our business colleagues seek to have this product now be known as Gramoxone 3SL. I would like to know how best to make this change. I could submit a revised version of the pending label changing to the new name but not sure how that would impact the product tracking in your systems. Another perhaps better approach would be retain the original name and submit an alternate brand name request with the corresponding ABN version of the label. This may be easier as the pending CSFs also list the product name as Gramoxone 3LB so having 3SL as an alternate brand name would prevent needing replacement CSFs with the 3SL name. I am not sure which would be the best approach to take.

Another consideration is that Agency is actively reviewing the phase 3 labels submitted late March/April by all of the paraquat registrants as required by the PQT Human Health Mitigation Decision. It is my understanding these are close to being approved. Once these phase 3 labels are approved for the currently registered products, I expect it will likely necessitate changes to this pending label for 100-RALE to ensure full alignment with the final approved paraquat phase 3 labels. That being the case, would it be better/more efficient to change the name or submit the ABN when we are making any changes the Agency may require to the label prior to the registration decision. We plan to launch this product this fall and thus it would be important for us to have the Gramoxone 3SL name in place at the time of the registration decision.

Thanks for your thoughts on this matter,

Monty

From: Dixon Monty USGR
Sent: Thursday, March 21, 2019 8:22 AM
To: Rowland, Grant <Rowland.Grant@epa.gov>
Subject: RE: EPA reg # 100-RALE

Good Morning Grant,

Thanks for the message/follow-up. Syngenta supports an extension for this action (EPA Reg. # 100-RALE) until July 15, 2019.

Hope all is well,
Monty

From: Rowland, Grant [mailto:Rowland.Grant@epa.gov]
Sent: Wednesday, March 20, 2019 4:27 PM
To: Dixon Monty USGR <monty.dixon@syngenta.com>
Subject: RE: EPA reg # 100-RALE

Hello Monty,
I know this one has been put on the back burner while we have been focusing on Tavium but the PRIA expires next Monday. Knowing that, it may be best to agree on a new date for this one to avoid it from falling off the PRIA clock. Would you agree?

Our Science team is still making their way through a backlog and this one still needs some back and forth Q&A between the EPA and Syngenta, so I would rerecommended nothing shorter than 90 days. Please let me know your thoughts on the matter as soon as possible. Thank you

-Grant

Grant Rowland
Herbicide Branch
Registration Division
Office of Pesticide Programs
703-347-0254

From: Dixon Monty USGR <monty.dixon@syngenta.com>
Sent: Wednesday, February 13, 2019 4:59 PM
To: Rowland, Grant <Rowland.Grant@epa.gov>
Subject: RE: EPA reg # 100-RALE

Hi Grant,

Thanks for the heads up. I am including a courtesy copy of the cover letter which includes an appendix that provides detailed information supporting this pending product. I would like to have a call to discuss this submission and the information provided. Is there a good time for me to call you or please call me anytime. Note – I will be flying back from WSSA tomorrow so may be difficult to reach between 10-4 EST. I could call anytime Friday with the exception of between 1030 and 1130 EST.

Thanks,

Monty

From: Rowland, Grant [mailto:Rowland.Grant@epa.gov]
Sent: Wednesday, February 13, 2019 3:47 PM
To: Dixon Monty USGR <monty.dixon@syngenta.com>
Subject: EPA reg # 100-RALE

Hello Monty,

I am writing concerning one of your recent submission for the active ingredient paraquat, epa reg # 100-RALE. It appears the acute tox studies you submitted for this product have never been reviewed by the Agency. Therefore this action cannot be an R300 as it originally came in and needs to be recoded so that the data can be reviewed.
Our front end team may have already reached out to you regarding the need for it to be recoded and put on the correct timeline. If not, please consider this a heads up that they will be reaching out to you shortly. Thank you.

-Grant

Grant Rowland
Herbicide Branch
Registration Division
Office of Pesticide Programs
703-347-0254

Message

From: Dixon Monty USGR [monty.dixon@syngenta.com]
Sent: 6/14/2019 6:49:32 PM
To: Rowland, Grant [Rowland.Grant@epa.gov]
CC: Mannix, Marianne [Mannix.Marianne@epa.gov]
Subject: Name Change Requested for d EPA reg # 100-RALE

Hi Grant,

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To: Dixon Monty USGR <monty.dixon@syngenta.com>
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Grant Rowland
Herbicide Branch
Registration Division
Office of Pesticide Programs
703-347-0254

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Sent: Wednesday, February 13, 2019 4:59 PM
To: Rowland, Grant <Rowland.Grant@epa.gov>
Subject: RE: EPA reg # 100-RALE

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Thanks,

Monty

From: Rowland, Grant [mailto:Rowland.Grant@epa.gov]
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To: Dixon Monty USGR <monty.dixon@syngenta.com>
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-Grant

Grant Rowland
Herbicide Branch
Registration Division
Office of Pesticide Programs
703-347-0254

Message

From: Dixon Monty USGR [monty.dixon@syngenta.com]
Sent: 6/6/2019 11:14:45 PM
To: Mannix, Marianne [Mannix.Marianne@epa.gov]
CC: Sherman, Kelly [Sherman.Kelly@epa.gov]; Schroeder, Carolyn [Schroeder.Carolyn@epa.gov]
Subject: RE: Question on bulk distributors

Hi Marianne,

Thanks so much for this clarification. Very much appreciated.

Hope you have a great weekend,

Monty

From: Mannix, Marianne [mailto:Mannix.Marianne@epa.gov]
Sent: Thursday, June 6, 2019 7:07 PM
To: Dixon Monty USGR <monty.dixon@syngenta.com>
Cc: Sherman, Kelly <Sherman.Kelly@epa.gov>; Schroeder, Carolyn <Schroeder.Carolyn@epa.gov>
Subject: RE: Question on bulk distributors

Hi Monty,

There is no simple answer here, but Nancy Fitz has provided guidance based on two possible scenarios. Please see below.

If the pesticide is being transferred from bulk containers into minibulk containers for sale/distribution, this is repackaging (which is a type of production). The workers are producing/repackaging the pesticide, which is different than mixing/loading pesticide – so they are not handlers (mixers/loaders). Therefore, they are not covered by WPS. Since they are not "using" the pesticide by mixing, loading or applying, they do not have to be certified applicators under the paraquat mitigation measures.

If the pesticide is being transferred from bulk containers into service containers for application (usually commercial application), this is considered mixing/loading that is part of the use/application. In this case, the workers are handlers – so they are subject to WPS. They would have to be certified applicators under the paraquat mitigation measures because working under the supervision of a commercial applicator is not an option.

Marianne A. Mannix
Office of Pesticide Programs
U.S. Environmental Protection Agency
(703) 347-0275

From: Dixon Monty USGR <monty.dixon@syngenta.com>
Sent: Wednesday, June 05, 2019 4:37 PM
To: Mannix, Marianne <Mannix.Marianne@epa.gov>
Subject: Question on bulk distributors

Hi Marianne,

Hope all is well. We have had a couple of questions related to bulk tank handling (large tanks such as attached picture) that are used to transfer paraquat products to mini bulk containers. At an earlier meeting, we discussed these and confirmed that these do not require the "one-sip" can kill sticker. We have had some inquires about if the workers transferring material from these bulk containers to minibulk containers have to be certified applicators under the human health mitigation decision. I don't believe that is the intention of the user restriction. We support fully these workers having access to and taking the paraquat training materials. However, they are not workers who work would be engaged in applications or mixing loading for spray tanks and as such, they would not typically have taken the certified applicator training. Can you please provide guidance on this question?

Thanks

Monty

Message

From: Dixon Monty USGR [monty.dixon@syngenta.com]
Sent: 6/5/2019 8:36:41 PM
To: Mannix, Marianne [Mannix.Marianne@epa.gov]
Subject: Question on bulk distributors
Attachments: Bulk.pdf

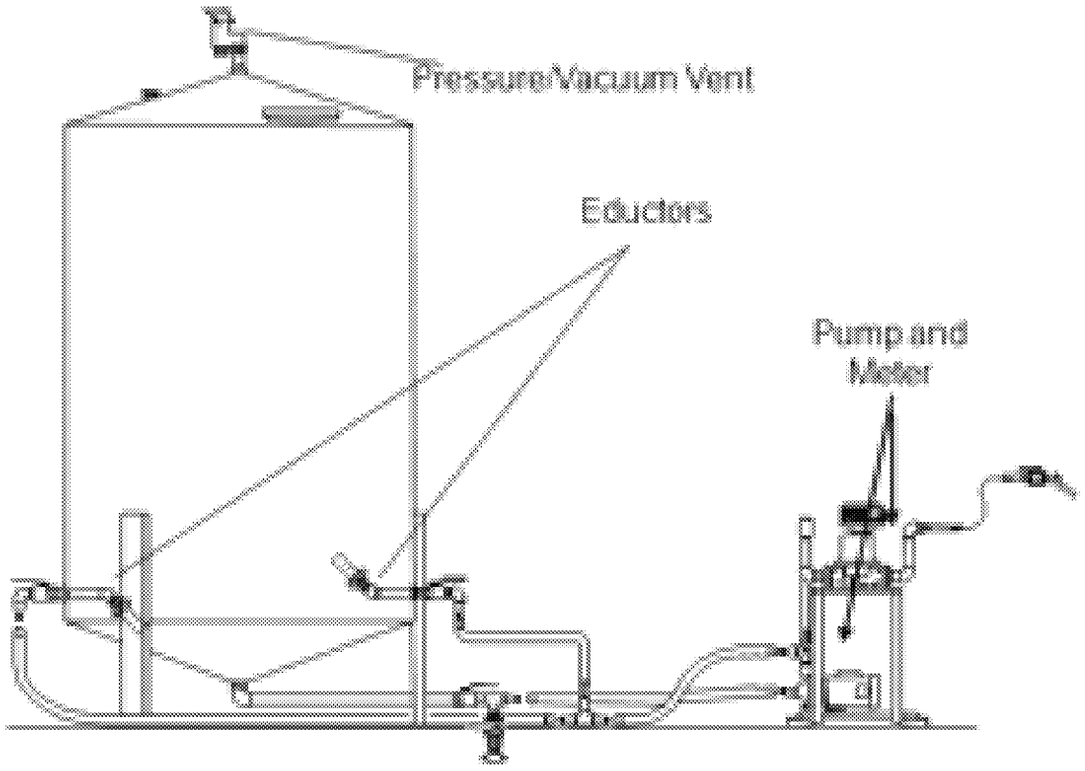
Flag: Follow up

Hi Marianne,

Hope all is well. We have had a couple of questions related to bulk tank handling (large tanks such as attached picture) that are used to transfer paraquat products to mini bulk containers. At an earlier meeting, we discussed these and confirmed that these do not require the "one-sip" can kill sticker. We have had some inquires about if the workers transferring material from these bulk containers to minibulk containers have to be certified applicators under the human health mitigation decision. I don't believe that is the intention of the user restriction. We support fully these workers having access to and taking the paraquat training materials. However, they are not workers who work would be engaged in applications or mixing loading for spray tanks and as such, they would not typically have taken the certified applicator training. Can you please provide guidance on this question?

Thanks
Monty

Bulk Tank Configuration



Syngenta Bulk System Product Class III

Message

From: Dixon Monty USGR [monty.dixon@syngenta.com]
Sent: 6/4/2019 7:56:14 PM
To: Mannix, Marianne [Mannix.Marianne@epa.gov]
CC: Eay Pat USGR [pat.eay@syngenta.com]
Subject: RE: Please resubmit paraquat phase 3 label amendments as Registration Review Label (RRL)

Hi Marianne,

Please disregard the message below. Pat just spoke with Banza from the Front End Screen and confirmed that if we uploading the submission into the Reg Review Label section, the submission should get to you with no problem. Pat is going to resubmit the Gramoxone SL 2.0 later today.

Thanks

Monty

From: Dixon Monty USGR
Sent: Tuesday, June 4, 2019 2:04 PM
To: Mannix, Marianne <Mannix.Marianne@epa.gov>
Cc: Eay Pat USGR <pat.eay@syngenta.com>
Subject: RE: Please resubmit paraquat phase 3 label amendments as Registration Review Label (RRL)

Hi Marianne,

One quick question. As Pat is working on this, it is not clear if we should withdraw the original submission and resubmit as directed on the portal. We are concerned the portal will recognize the earlier filename and group with original submission which may cause it to be rejected/denied. Can you please advise and we will submit upon confirmation.

Thanks
Monty

From: Mannix, Marianne [mailto:Mannix.Marianne@epa.gov]
Sent: Monday, June 3, 2019 6:30 PM
To: Dixon Monty USGR <monty.dixon@syngenta.com>; Eay Pat USGR <pat.eay@syngenta.com>
Cc: Sherman, Kelly <Sherman.Kelly@epa.gov>; Schroeder, Carolyn <Schroeder.Carolyn@epa.gov>
Subject: Please resubmit paraquat phase 3 label amendments as Registration Review Label (RRL)

Hi Monty,

I appreciate your submission of Syngenta's paraquat label amendments to comply with phase 3 of the paraquat mitigation decision on time. However, the amendment came through the portal as a registration action, rather than a registration review action, and I cannot access the label in the system. Please resubmit your label amendments via CDX under Re-evaluation/Registration Review Label (see the attached picture).

Thank you,
Marianne

Marianne A. Mannix
Office of Pesticide Programs
U.S. Environmental Protection Agency
(703) 347-0275

Message

From: Dixon Monty USGR [monty.dixon@syngenta.com]
Sent: 6/4/2019 6:04:07 PM
To: Mannix, Marianne [Mannix.Marianne@epa.gov]
CC: Eay Pat USGR [pat.eay@syngenta.com]
Subject: RE: Please resubmit paraquat phase 3 label amendments as Registration Review Label (RRL)

Hi Marianne,

One quick question. As Pat is working on this, it is not clear if we should withdraw the original submission and resubmit as directed on the portal. We are concerned the portal will recognize the earlier filename and group with original submission which may cause it to be rejected/denied. Can you please advise and we will submit upon confirmation.

Thanks
Monty

From: Mannix, Marianne [mailto:Mannix.Marianne@epa.gov]
Sent: Monday, June 3, 2019 6:30 PM
To: Dixon Monty USGR <monty.dixon@syngenta.com>; Eay Pat USGR <pat.eay@syngenta.com>
Cc: Sherman, Kelly <Sherman.Kelly@epa.gov>; Schroeder, Carolyn <Schroeder.Carolyn@epa.gov>
Subject: Please resubmit paraquat phase 3 label amendments as Registration Review Label (RRL)

Hi Monty,

I appreciate your submission of Syngenta's paraquat label amendments to comply with phase 3 of the paraquat mitigation decision on time. However, the amendment came through the portal as a registration action, rather than a registration review action, and I cannot access the label in the system. Please resubmit your label amendments via CDX under Re-evaluation/Registration Review Label (see the attached picture).

Thank you,
Marianne

Marianne A. Mannix
Office of Pesticide Programs
U.S. Environmental Protection Agency
(703) 347-0275

Message

From: Dixon Monty USGR [monty.dixon@syngenta.com]
Sent: 6/3/2019 10:39:15 PM
To: Mannix, Marianne [Mannix.Marianne@epa.gov]; Eay Pat USGR [pat.eay@syngenta.com]
CC: Sherman, Kelly [Sherman.Kelly@epa.gov]; Schroeder, Carolyn [Schroeder.Carolyn@epa.gov]
Subject: RE: Please resubmit paraquat phase 3 label amendments as Registration Review Label (RRL)

Hi Marianne,

I am sorry for the confusion, I will work with Pat to get this squared away ASAP.

Hope all is well,

Monty

From: Mannix, Marianne [mailto:Mannix.Marianne@epa.gov]
Sent: Monday, June 3, 2019 6:30 PM
To: Dixon Monty USGR <monty.dixon@syngenta.com>; Eay Pat USGR <pat.eay@syngenta.com>
Cc: Sherman, Kelly <Sherman.Kelly@epa.gov>; Schroeder, Carolyn <Schroeder.Carolyn@epa.gov>
Subject: Please resubmit paraquat phase 3 label amendments as Registration Review Label (RRL)

Hi Monty,

I appreciate your submission of Syngenta's paraquat label amendments to comply with phase 3 of the paraquat mitigation decision on time. However, the amendment came through the portal as a registration action, rather than a registration review action, and I cannot access the label in the system. Please resubmit your label amendments via CDX under Re-evaluation/Registration Review Label (see the attached picture).

Thank you,
Marianne

Marianne A. Mannix
Office of Pesticide Programs
U.S. Environmental Protection Agency
(703) 347-0275

Message

From: Dixon Monty USGR [monty.dixon@syngenta.com]
Sent: 5/7/2019 7:56:26 PM
To: Mannix, Marianne [Mannix.Marianne@epa.gov]
Subject: Study Reference
Attachments: Rose submission PP 796 National Pesticide Information Retrieval System -....pdf

Hi Marianne,

John and I look forward to meeting with you and Reuben on Thursday. I wanted to provide you the reference information for the study that I discussed with you recently. I have attached the NPIS MRID reference for the study....it is the yellow highlighted reference (MRID 00113689). You will find a second reference (MRID 00082264) as well to an earlier submitted study referenced in the highlighted study that was received concurrently by the Agency.

With Best Regards,
Monty

Montague (Monty) Dixon
Telephone: 336.632.7055
Cell Phone: Ex. 6 Personal Privacy (PP)

Citation, Chemistry and Subject

Date of Search: 05/02/19
Time of Search: 10:43

Last Search: MRIDs: 00082264 OR 00113689

Number of Citations Selected: 2

00082264 Rose, M.S.; Parkinson, G.R.; Laird, W.J.D. (1976) The Effect of Administration of an Emetic (PP 796) on Paraquat Toxicity in Dog and Monkey: Report No. CTL/R/391. (Unpublished study received Apr 13, 1977 under PP0796; submitted by Chevron Chemical Co., Richmond, Calif.; CDL:098315-M)

*** Chemistry Indexing ***
SUBSTANCE CLASS: Single FORMULATION: Not Identified
Paraquat dichloride (61601)

SUBSTANCE CLASS: Single FORMULATION: Not Formulated Pesticide
Paraquat dichloride (61601)

*** Subject Indexing ***
ROOT DT: 40050505
Acute Exposure - Oral
GUIDELINE: 81-1
Acute Tox & Irritation - Acute Oral Toxicity
CONTENT CATEGORY: Complete Primary Report -- Experimental Research
TEST ORGANISM: Laboratory Animals - Mammals

00113689 Rose, M. (1977) The Concentration of PP 796 Required To Produce Emesis in Experimental Animals and an Estimation of the Emetic Dose in Man: Report No. CTL/R/390 (R). (Unpublished study received Apr 13, 1977 under unknown admin. no.; submitted by Chevron Chemical Co., Richmond, CA; CDL:098316-D)

*** Chemistry Indexing ***
SUBSTANCE CLASS: Single FORMULATION: Not Formulated Pesticide

*** Subject Indexing ***
ROOT DT: 1005
Pesticide Use - Product Performance (Efficacy)
CONTENT CATEGORY: Secondary Report Attributed to Others

ROOT DT: 5510
Risk to Non-Target Organisms
CONTENT CATEGORY: Secondary Report Attributed to Others

ROOT DT: 4005
Toxicological Effects by Route & Duration of Exposure
CONTENT CATEGORY: Secondary Report Attributed to Others

ROOT DT: 40050000

CONTENT CATEGORY: Secondary Report Attributed to Others
TEST ORGANISM: Laboratory Animals - Mammals

ROOT DT: 40050000
CONTENT CATEGORY: Secondary Report Attributed to Others
TEST ORGANISM: Humans - General Population or Unspecified

*** END OF OUTPUT ***

Message

From: Mannix, Marianne [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=962A1F78B5B444CC93D3654A16A9329E-MANNIX, MARIANNE]
Sent: 8/7/2019 10:31:01 PM
To: 'Dixon Monty USGR' [monty.dixon@syngenta.com]
Subject: RE: Perhaps Thursday?

Sure, sounds good!

Marianne A. Mannix
Office of Pesticide Programs
U.S. Environmental Protection Agency
(703) 347-0275

From: Dixon Monty USGR <monty.dixon@syngenta.com>
Sent: Wednesday, August 07, 2019 6:16 PM
To: Mannix, Marianne <Mannix.Marianne@epa.gov>
Subject: RE: Perhaps Thursday?

Hi Marianne,

I have to be out of the office in the morning, perhaps I can touch base with you at the end of the call on Friday? Just want to follow up a bit on the suggested changes to the training you provided earlier.

Hope you have a great evening,

Monty

From: Mannix, Marianne [mailto:Mannix.Marianne@epa.gov]
Sent: Wednesday, August 7, 2019 5:57 PM
To: Dixon Monty USGR <monty.dixon@syngenta.com>
Subject: RE: Perhaps Thursday?

Hi Monty – sorry I meant to call you today… I'll give you a call in the morning.

Marianne A. Mannix
Office of Pesticide Programs
U.S. Environmental Protection Agency
(703) 347-0275

From: Dixon Monty USGR <monty.dixon@syngenta.com>
Sent: Tuesday, August 06, 2019 2:22 PM
To: Mannix, Marianne <Mannix.Marianne@epa.gov>
Subject: RE: Perhaps Thursday?

Hi Marianne,

Thanks. Do you have time now for brief (~2 min) call?

Monty

From: Mannix, Marianne [mailto:Mannix.Marianne@epa.gov]
Sent: Tuesday, August 6, 2019 2:19 PM
To: Dixon Monty USGR <monty.dixon@syngenta.com>
Subject: RE: Perhaps Thursday?

Thanks Monty. I'll discuss with Nancy. We can use my conference line.

Call in #: Ex. 6 Conference Code
Conference ID: Ex. 6 Conference Code

Marianne A. Mannix
Office of Pesticide Programs
U.S. Environmental Protection Agency
(703) 347-0275

From: Dixon Monty USGR <monty.dixon@syngenta.com>
Sent: Tuesday, August 06, 2019 2:11 PM
To: Mannix, Marianne <Mannix.Marianne@epa.gov>
Subject: RE: Perhaps Thursday?

Hi Marianne,

Here are a few questions we would like to touch base on during our call Friday. I am hopeful that the call won't take too long. I am happy to provide a call in number unless you would prefer to use yours.

Thanks
Monty

1. Scenario: Bulk product purchased and delivered prior to the phase 2 Nov 14th 2019 label implementation date. The active label is the current label and not the phase II label. No additional product has been placed into the tank through the Nov. 14th 2019 date.
    - Will customers be required to re-label their bulk tanks by Nov. 14th, even if product in tank received prior to Nov. 14th?
    - Product repacked out of tank filled PRIOR to Nov. 14th will be distributed with the labeling at time product was delivered (non-phase II label). For product repacked out of tank filled AFTER Nov. 14th, which label should be used: the label of the product when delivered or the Nov 14th phase II label even if not new product has been added to the bulk tank?
    - What labels/stickers do they want on the stationary bulk tanks? (ie., Spanish/English pictorial, product label, on sip can kill, etc.)

2. For portable bulk packages >120 gallons such as 275 gallon totes. Clarifications on how "counter cards", PPSR, and one sip stickers are intended to be distributed?

3. Need clarification on training requirements for warehouse / distributor personnel that fill mini bulk totes
    a. Your previous on explanation why bulk repackagers don't have to be certified applicators was stated nicely. We have received and anticipate will received additional questions on this. I believe your intention is to add this information to the paraquat FAQs. We would like to be able to have something on file to provide to states, retailers, distributors who ask this question. Would this be possible or would the best path be directing them to the FAQs?

From: Dixon Monty USGR
Sent: Monday, August 5, 2019 2:27 PM
To: Mannix, Marianne <Mannix.Marianne@epa.gov>
Subject: RE: Perhaps Thursday?

Hi Marianne,

Thanks that will be great. I will try to have some questions to you by mid-day tomorrow.

Take Care,

Monty

From: Mannix, Marianne [mailto:Mannix.Marianne@epa.gov]
Sent: Monday, August 5, 2019 2:03 PM
To: Dixon Monty USGR <monty.dixon@syngenta.com>
Subject: RE: Perhaps Thursday?

Hi Monty,

Sure – 2:30 works. If possible, could you get a list of questions to me in advance? Nancy is on leave starting Thursday afternoon, but I could run them by her earlier in the week and hopefully have some responses for you when we meet.

Thanks,
Marianne

Marianne A. Mannix
Office of Pesticide Programs
U.S. Environmental Protection Agency
(703) 347-0275

From: Dixon Monty USGR <monty.dixon@syngenta.com>
Sent: Monday, August 05, 2019 1:57 PM
To: Mannix, Marianne <Mannix.Marianne@epa.gov>
Subject: RE: Perhaps Thursday?

Hi Marianne,

Our folks are free Friday afternoon. Would 2-230/245 work for you? If not, I think we can make any time after 1 work.

Thanks
Monty

From: Mannix, Marianne [mailto:Mannix.Marianne@epa.gov]
Sent: Monday, August 5, 2019 10:34 AM
To: Dixon Monty USGR <monty.dixon@syngenta.com>
Subject: RE: Perhaps Thursday?

Hi Monty,

Friday would work better for us, if possible.

Marianne A. Mannix
Office of Pesticide Programs
U.S. Environmental Protection Agency
(703) 347-0275

From: Dixon Monty USGR <monty.dixon@syngenta.com>
Sent: Monday, August 05, 2019 9:58 AM
To: Mannix, Marianne <Mannix.Marianne@epa.gov>
Subject: Perhaps Thursday?

Hi Marianne,

I just reached out to our Team and it appears that tomorrow at one is also booked for them. I have asked them to put together some times that would work and I will send them to you shortly.

Thanks,

Monty

Get Outlook for iOS

Message

From: Mannix, Marianne [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=962A1F78B5B444CC93D3654A16A9329E-MANNIX, MARIANNE]
Sent: 8/7/2019 9:22:24 PM
To: 'Jones, Patrick' [patrick.jones@ncagr.gov]; Laird Patsy USGR [patsy.laird@syngenta.com]; Moseley Carroll USGR [carroll.moseley@syngenta.com]
Subject: RE: Paraquat Training

Hi Pat,

Thanks for your message. I will touch base with my management and let you know.

-Marianne

Marianne A. Mannix
Office of Pesticide Programs
U.S. Environmental Protection Agency
(703) 347-0275

From: Jones, Patrick <patrick.jones@ncagr.gov>
Sent: Wednesday, August 07, 2019 1:37 PM
To: Mannix, Marianne <Mannix.Marianne@epa.gov>; Laird Patsy USGR <patsy.laird@syngenta.com>; Moseley Carroll USGR <carroll.moseley@syngenta.com>
Subject: Paraquat Training

Hello everyone – I am reaching out again, to see if you would be able to present at the AAPCO 2020 Conference on the paraquat training updates since last years AAPCO Conference. Your session last year was a huge success and received great comments and ratings. I know there have been significant updates and progress in the in-person training areas. We would likely schedule the presentation for Tuesday afternoon, March 10, 20120. If there is someone else that we need to add – please let me know. Thank you for your consideration and your devotion to this project! Take care and I hope you enjoy the rest of your summer!!

Sincerely, Patrick Jones

Deputy Director of Pesticide Programs
North Carolina Dept. of Agriculture and Consumer Services
Structural Pest Control and Pesticides Division
1090 Mail Service Center
Raleigh, NC 27699-1090
Direct Dial (919) 857-4143
Cell Ex. 6 Personal Privacy (PP)

Message

From: Mannix, Marianne [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=962A1F78B5B444CC93D3654A16A9329E-MANNIX, MARIANNE]
Sent: 8/6/2019 6:19:22 PM
To: 'Dixon Monty USGR' [monty.dixon@syngenta.com]
Subject: RE: Perhaps Thursday?

Thanks Monty. I'll discuss with Nancy. We can use my conference line.

Call in #: Ex. 6 Conference Code
Conference ID: Ex. 6 Conference Code

Marianne A. Mannix
Office of Pesticide Programs
U.S. Environmental Protection Agency
(703) 347-0275

From: Dixon Monty USGR <monty.dixon@syngenta.com>
Sent: Tuesday, August 06, 2019 2:11 PM
To: Mannix, Marianne <Mannix.Marianne@epa.gov>
Subject: RE: Perhaps Thursday?

Hi Marianne,

Here are a few questions we would like to touch base on during our call Friday. I am hopeful that the call won't take too long. I am happy to provide a call in number unless you would prefer to use yours.

Thanks
Monty

1. Scenario: Bulk product purchased and delivered prior to the phase 2 Nov 14th 2019 label implementation date. The active label is the current label and not the phase II label. No additional product has been placed into the tank through the Nov. 14th 2019 date.
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2. For portable bulk packages >120 gallons such as 275 gallon totes. Clarifications on how "counter cards", PPSR, and one sip stickers are intended to be distributed?

3. Need clarification on training requirements for warehouse / distributor personnel that fill mini bulk totes
    a. Your previous on explanation why bulk repackagers don't have to be certified applicators was stated nicely. We have received and anticipate will received additional questions on this. I believe your intention is to add this information to the paraquat FAQs. We would like to be able to have something on file to provide to states, retailers, distributors who ask this question. Would this be possible or would the best path be directing them to the FAQs?

From: Dixon Monty USGR
Sent: Monday, August 5, 2019 2:27 PM
To: Mannix, Marianne <Mannix.Marianne@epa.gov>
Subject: RE: Perhaps Thursday?

Hi Marianne,

Thanks that will be great. I will try to have some questions to you by mid-day tomorrow.

Take Care,

Monty

From: Mannix, Marianne [mailto:Mannix.Marianne@epa.gov]
Sent: Monday, August 5, 2019 2:03 PM
To: Dixon Monty USGR <monty.dixon@syngenta.com>
Subject: RE: Perhaps Thursday?

Hi Monty,

Sure – 2:30 works. If possible, could you get a list of questions to me in advance? Nancy is on leave starting Thursday afternoon, but I could run them by her earlier in the week and hopefully have some responses for you when we meet.

Thanks,
Marianne

Marianne A. Mannix
Office of Pesticide Programs
U.S. Environmental Protection Agency
(703) 347-0275

From: Dixon Monty USGR <monty.dixon@syngenta.com>
Sent: Monday, August 05, 2019 1:57 PM
To: Mannix, Marianne <Mannix.Marianne@epa.gov>
Subject: RE: Perhaps Thursday?

Hi Marianne,

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Thanks
Monty

From: Mannix, Marianne [mailto:Mannix.Marianne@epa.gov]
Sent: Monday, August 5, 2019 10:34 AM
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Subject: RE: Perhaps Thursday?

Hi Monty,

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Marianne A. Mannix
Office of Pesticide Programs
U.S. Environmental Protection Agency
(703) 347-0275

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Sent: Monday, August 05, 2019 9:58 AM
To: Mannix, Marianne <Mannix.Marianne@epa.gov>
Subject: Perhaps Thursday?

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Monty

Get Outlook for iOS

Message

From: Mannix, Marianne [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=962A1F78B5B444CC93D3654A16A9329E-MANNIX, MARIANNE]
Sent: 8/2/2019 9:39:07 PM
To: 'Dixon Monty USGR' [monty.dixon@syngenta.com]
CC: Sherman, Kelly [Sherman.Kelly@epa.gov]; Perry, Tracy [Perry.Tracy@epa.gov]; Schroeder, Carolyn [Schroeder.Carolyn@epa.gov]
Subject: EPA suggested improvements to Paraquat Training Program

Hi Monty,

At the beginning of the summer we discussed a few issues with the paraquat training that have been brought to our attention since it has gone live. This email is to follow up on that conversation and identify issues which the Agency feels need to be addressed. We used red font to indicate the things that are most problematic and really need to be changed. Once you have a chance to look through these, please respond indicating how you will address these, and an proposed timeline. If you are unable to implement all of these changes right away, we have some ideas about addressing the comments in the interim.

Thanks for your continued cooperation with the paraquat human health mitigation.

-Marianne

Two major comments regarding exposure – there are multiple points I

- Routes of exposure slide - Inhalation is said to be unlikely….due to vapor pressure and droplet size. EPA asked registrants to remove this statement when we were having label language discussions because it sounds it's downplaying the potential risk, so it shouldn't have been added to the training.

- There's a slide where can't read the double asterisk at bottom of slide "** for undamaged skin". - that slide makes it seem like it's not a big deal getting on skin… like the inhalation, this is downplaying the potential risk, when the intention of the training is to make people aware of potential risks.
- Landing page on website says it will take 45, intro says it will take 30

- Video at 3:15: Shows mixer/loader in overprotective PPE (chemical resistant suit). Also shows him with a full beard, which means that he cannot legally use a tight-fitting respirator; he could wear a loose-fitting powered air purifying respirator (PAPR) with an HE filter. Mixer/loader with a beard puts on a tight-fitting respirator (not legal) and does not do a seal check which needs to be done every time you put on a respirator.

- Video at 6:42: Same problems with mixer/loader – overprotective PPE (chemical resistant suit) and is wearing a tight-fitting respirator with a beard.

- Review question 3: When providing the answer (11:55), the narrator says the answer is C 17 people have died since 2000 from accidental ingestion of paraquat. That isn't completely accurate since more people have died since then. It would be more accurate to say 17 people died between 2000 and 2016 from accidental ingestion of paraquat.

- Video at 14:50: Same problems with mixer/loader – overprotective PPE (chemical resistant suit) and is wearing a tight-fitting respirator with a beard.

- Video at 16:01: Shows mixer/loader in overprotective PPE (chemical resistant suit). Mixer/loader with a beard puts on a tight-fitting respirator (not legal) and does not do a seal check which needs to be done every time you

put on a respirator. Holds the container awkwardly by the bottom while pouring. Can see a small spill, which he doesn't clean up. I think it's realistic that a spill like that would not be cleaned up. Maybe add a sentence about cleaning up the spill?

- Video at 17:35: Shows mixer/loader in overprotective PPE (chemical resistant suit). Mixer/loader with a beard puts on a tight-fitting respirator (not legal) and does not do a seal check which needs to be done every time you put on a respirator. Holds the container awkwardly by the bottom while pouring.

- Inhalation Exposure slide (19:23): The photos are fine regarding respirators – this guy doesn't have a beard. It isn't clear whether the glasses he is wearing are acceptable protective eyewear. According to WPS, protective eyewear must be goggles; a face shield; safety glasses with front, brow and temple protection; or a full-face respirator. He could be wearing safety glasses, but can't tell if the glasses have front, brow and temple protection.

- Video (20:45). Same problems with mixer/loader – overprotective PPE (chemical resistant suit) and is wearing a tight-fitting respirator with a beard. Also holding the container near his face.

- Video (21:43). Same problems with mixer/loader – overprotective PPE (chemical resistant suit) and is wearing a tight-fitting respirator with a beard. Holds container awkwardly by the bottom while pouring. After splashing the face shield, he wipes it with just a paper towel (no water). Is that adequate? Ask a pesticide safety educator.

- Video (22:05). Same problems with mixer/loader – overprotective PPE (chemical resistant suit) and is wearing a tight-fitting respirator with a beard. Holds container awkwardly by the bottom while pouring and holds container high, near face. Narrator says "Note that he is also pouring the product below eye level..." Barely below eye level and not below level of eye shield.

- Video (22:25). Applicator with backpack sprayer. Overprotective PPE (chemical resistant suit), has a wouldn't be able to wear a tight-fitting respirator. Not sure the safety glasses have front, brow and temple protection (no brow protection). Should wear gloves to do safety inspection of backpack sprayer (and probably all PPE). In WPS, the definition of handler includes "cleaning, adjusting, handling, or repairing the parts of mixing, loading, or application equipment that may contain pesticide residues." This seems to fall within that, so he should be in full handler PPE. This one probably rises to the level of needing to be fixed.

- Slide: Skin exposure & Using a Backpack Sprayer. The photo implies the person is applying paraquat with a backpack sprayer. The applicator is not wearing a respirator, which is required for applicators. Has a beard, which requires a loose-fitting PAPR.

- Video (23:45): Applicator wearing overprotective PPE (chemical resistant suit). Different person (no beard) so respirator is okay. Unclear if safety glasses have brow and temple protection. Decent sized spill. May want to at least mention cleaning up the spill.

- Video (25:46). Applicator wearing overprotective PPE (chemical resistant suit). Different person (no beard) so respirator is okay. Wearing face shield over safety glasses. This may be realistic since applicators have more flexibility (PPE says protective eyewear) while mixer/loaders have to wear a face shield. It makes sense to have the safety glasses on with the respirator (to ensure seal) for application and then to put a face shield over it for mixing/loading. Unclear if the safety glasses have brow and temple protection. Welcome pesticide safety educator review this. The video mentions the voluntary use of coveralls or chemical resistant suit here, which is good – but would be better if it was earlier in the training.

- Contamination supplies -demonstration of handwashing is weak – a very low flow of water, and short duration (but didn't raise as a big issue). Similarly, later in training, Under WPS -requires 3 gal per handler for decontamination as the minimum requirement (this is so it's practical to carry enough water

when away from water source). However, the demonstration of rinsing is weak, and the wording as well. It's a quick splash of the face and hair under a weak stream of very little water.

- Video for removal of PPE - the bin isn't big enough for saturated overalls.

Marianne A. Mannix
Office of Pesticide Programs
U.S. Environmental Protection Agency
(703) 347-0275

Message

From: Mannix, Marianne [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=962A1F78B5B444CC93D3654A16A9329E-MANNIX, MARIANNE]
Sent: 7/17/2019 4:24:23 PM
To: 'Dixon Monty USGR' [monty.dixon@syngenta.com]
Subject: RE: Paraquat Training Website

Thanks for keeping me in the loop, Monty. Just so you know, on my end, I hope to get you a list of the edits needed for the training materials this week.

Best,

Marianne A. Mannix
Office of Pesticide Programs
U.S. Environmental Protection Agency
(703) 347-0275

From: Dixon Monty USGR <monty.dixon@syngenta.com>
Sent: Monday, July 15, 2019 2:38 PM
To: Mannix, Marianne <Mannix.Marianne@epa.gov>
Subject: Paraquat Training Website

Hi Marianne,

Just keeping you in the loop....I have requested a meeting with Patsy Laird and Tom Smith later this week to inquire about the possibility of modifying the training and adding cc to this current version if possible.

I will let you know what they say.

With Best Regards,
Monty

Montague (Monty) Dixon
Telephone: 336.632.7055
Cell Phone: Ex. 6 Personal Privacy (PP)

Message

From: Mannix, Marianne [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=962A1F78B5B444CC93D3654A16A9329E-MANNIX, MARIANNE]
Sent: 6/20/2019 5:31:50 PM
To: 'Dixon Monty USGR' [monty.dixon@syngenta.com]
Subject: RE: Courtesy Copy of 6(A)2 submission related to paraquat

Hi Monty,

Sad news. Thanks for the heads up.

-Marianne

Marianne A. Mannix
Office of Pesticide Programs
U.S. Environmental Protection Agency
(703) 347-0275

From: Dixon Monty USGR <monty.dixon@syngenta.com>
Sent: Thursday, June 20, 2019 12:44 PM
To: Mannix, Marianne <Mannix.Marianne@epa.gov>
Subject: Courtesy Copy of 6(A)2 submission related to paraquat

Dear Marianne,

Please find a courtesy copy of notification under FIFRA 6(a)(2) of a reported death from an exposure of an individual drinking from a soft drink bottle that is alleged to have contained a paraquat product. We were informed on June 14, 2019 that a caller contacted ProPharma concerning a dermal exposure event which is being reported separately. During the call, the caller also indicated knowledge of a 45 - 50 year old male individual with whom he was acquainted, who allegedly consumed the product stored in a soft drink bottle and passed away four days post-exposure. The product was reported to be Gramoxone, however this product identification has not been confirmed. The official date of this alleged death is unknown.

With Best Regards,

Monty

Montague (Monty) Dixon
Telephone: 336.632.7055
Cell Phone: Ex. 6 Personal Privacy (PP)

Message

From: Mannix, Marianne [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=962A1F78B5B444CC93D3654A16A9329E-MANNIX, MARIANNE]
Sent: 6/6/2019 11:06:42 PM
To: 'Dixon Monty USGR' [monty.dixon@syngenta.com]
CC: Sherman, Kelly [Sherman.Kelly@epa.gov]; Schroeder, Carolyn [Schroeder.Carolyn@epa.gov]
Subject: RE: Question on bulk distributors

Hi Monty,

There is no simple answer here, but Nancy Fitz has provided guidance based on two possible scenarios. Please see below.

If the pesticide is being transferred from bulk containers into minibulk containers for sale/distribution, this is repackaging (which is a type of production). The workers are producing/repackaging the pesticide, which is different than mixing/loading pesticide – so they are not handlers (mixers/loaders). Therefore, they are not covered by WPS. Since they are not "using" the pesticide by mixing, loading or applying, they do not have to be certified applicators under the paraquat mitigation measures.

If the pesticide is being transferred from bulk containers into service containers for application (usually commercial application), this is considered mixing/loading that is part of the use/application. In this case, the workers are handlers – so they are subject to WPS. They would have to be certified applicators under the paraquat mitigation measures because working under the supervision of a commercial applicator is not an option.

Marianne A. Mannix
Office of Pesticide Programs
U.S. Environmental Protection Agency
(703) 347-0275

From: Dixon Monty USGR <monty.dixon@syngenta.com>
Sent: Wednesday, June 05, 2019 4:37 PM
To: Mannix, Marianne <Mannix.Marianne@epa.gov>
Subject: Question on bulk distributors

Hi Marianne,

Hope all is well. We have had a couple of questions related to bulk tank handling (large tanks such as attached picture) that are used to transfer paraquat products to mini bulk containers. At an earlier meeting, we discussed these and confirmed that these do not require the "one-sip" can kill sticker. We have had some inquires about if the workers transferring material from these bulk containers to minibulk containers have to be certified applicators under the human health mitigation decision. I don't believe that is the intention of the user restriction. We support fully these workers having access to and taking the paraquat training materials. However, they are not workers who work would be engaged in applications or mixing loading for spray tanks and as such, they would not typically have taken the certified applicator training. Can you please provide guidance on this question?

Thanks

Monty

Message

From: Mannix, Marianne [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=962A1F78B5B444CC93D3654A16A9329E-MANNIX, MARIANNE]
Sent: 6/6/2019 9:47:27 PM
To: 'Dixon Monty USGR' [monty.dixon@syngenta.com]
Subject: RE: Question on bulk distributors

Hi Monty,

Thanks for the question. I am looking into this and will get back to you ASAP.

Have a good weekend!
Marianne

Marianne A. Mannix
Office of Pesticide Programs
U.S. Environmental Protection Agency
(703) 347-0275

From: Dixon Monty USGR <monty.dixon@syngenta.com>
Sent: Wednesday, June 05, 2019 4:37 PM
To: Mannix, Marianne <Mannix.Marianne@epa.gov>
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Thanks

Monty

Message

From: Mannix, Marianne [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=962A1F78B5B444CC93D3654A16A9329E-MANNIX, MARIANNE]
Sent: 6/4/2019 8:46:53 PM
To: 'Dixon Monty USGR' [monty.dixon@syngenta.com]
CC: Eay Pat USGR [pat.eay@syngenta.com]
Subject: RE: Please resubmit paraquat phase 3 label amendments as Registration Review Label (RRL)

Hi Monty and Pat,

I have received your submission. Thanks for resubmitting.

-Marianne

Marianne A. Mannix
Office of Pesticide Programs
U.S. Environmental Protection Agency
(703) 347-0275

From: Dixon Monty USGR <monty.dixon@syngenta.com>
Sent: Tuesday, June 04, 2019 3:56 PM
To: Mannix, Marianne <Mannix.Marianne@epa.gov>
Cc: Eay Pat USGR <pat.eay@syngenta.com>
Subject: RE: Please resubmit paraquat phase 3 label amendments as Registration Review Label (RRL)

Hi Marianne,

Please disregard the message below. Pat just spoke with Banza from the Front End Screen and confirmed that if we uploading the submission into the Reg Review Label section, the submission should get to you with no problem. Pat is going to resubmit the Gramoxone SL 2.0 later today.

Thanks

Monty

From: Dixon Monty USGR
Sent: Tuesday, June 4, 2019 2:04 PM
To: Mannix, Marianne <Mannix.Marianne@epa.gov>
Cc: Eay Pat USGR <pat.eay@syngenta.com>
Subject: RE: Please resubmit paraquat phase 3 label amendments as Registration Review Label (RRL)

Hi Marianne,

One quick question. As Pat is working on this, it is not clear if we should withdraw the original submission and resubmit as directed on the portal. We are concerned the portal will recognize the earlier filename and group with original submission which may cause it to be rejected/denied. Can you please advise and we will submit upon confirmation.

Thanks
Monty

From: Mannix, Marianne [mailto:Mannix.Marianne@epa.gov]
Sent: Monday, June 3, 2019 6:30 PM
To: Dixon Monty USGR <monty.dixon@syngenta.com>; Eay Pat USGR <pat.eay@syngenta.com>
Cc: Sherman, Kelly <Sherman.Kelly@epa.gov>; Schroeder, Carolyn <Schroeder.Carolyn@epa.gov>
Subject: Please resubmit paraquat phase 3 label amendments as Registration Review Label (RRL)

Hi Monty,

I appreciate your submission of Syngenta's paraquat label amendments to comply with phase 3 of the paraquat mitigation decision on time. However, the amendment came through the portal as a registration action, rather than a registration review action, and I cannot access the label in the system. Please resubmit your label amendments via CDX under Re-evaluation/Registration Review Label (see the attached picture).

Thank you,
Marianne

Marianne A. Mannix
Office of Pesticide Programs
U.S. Environmental Protection Agency
(703) 347-0275

Message

From: Mannix, Marianne [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=962A1F78B5B444CC93D3654A16A9329E-MANNIX, MARIANNE]
Sent: 6/3/2019 10:30:13 PM
To: 'Dixon Monty USGR' [monty.dixon@syngenta.com]; Eay Pat USGR [pat.eay@syngenta.com]
CC: Sherman, Kelly [Sherman.Kelly@epa.gov]; Schroeder, Carolyn [Schroeder.Carolyn@epa.gov]
Subject: Please resubmit paraquat phase 3 label amendments as Registration Review Label (RRL)
Attachments: PSP applications.png

Hi Monty,

I appreciate your submission of Syngenta's paraquat label amendments to comply with phase 3 of the paraquat mitigation decision on time. However, the amendment came through the portal as a registration action, rather than a registration review action, and I cannot access the label in the system. Please resubmit your label amendments via CDX under Re-evaluation/Registration Review Label (see the attached picture).

Thank you,
Marianne

Marianne A. Mannix
Office of Pesticide Programs
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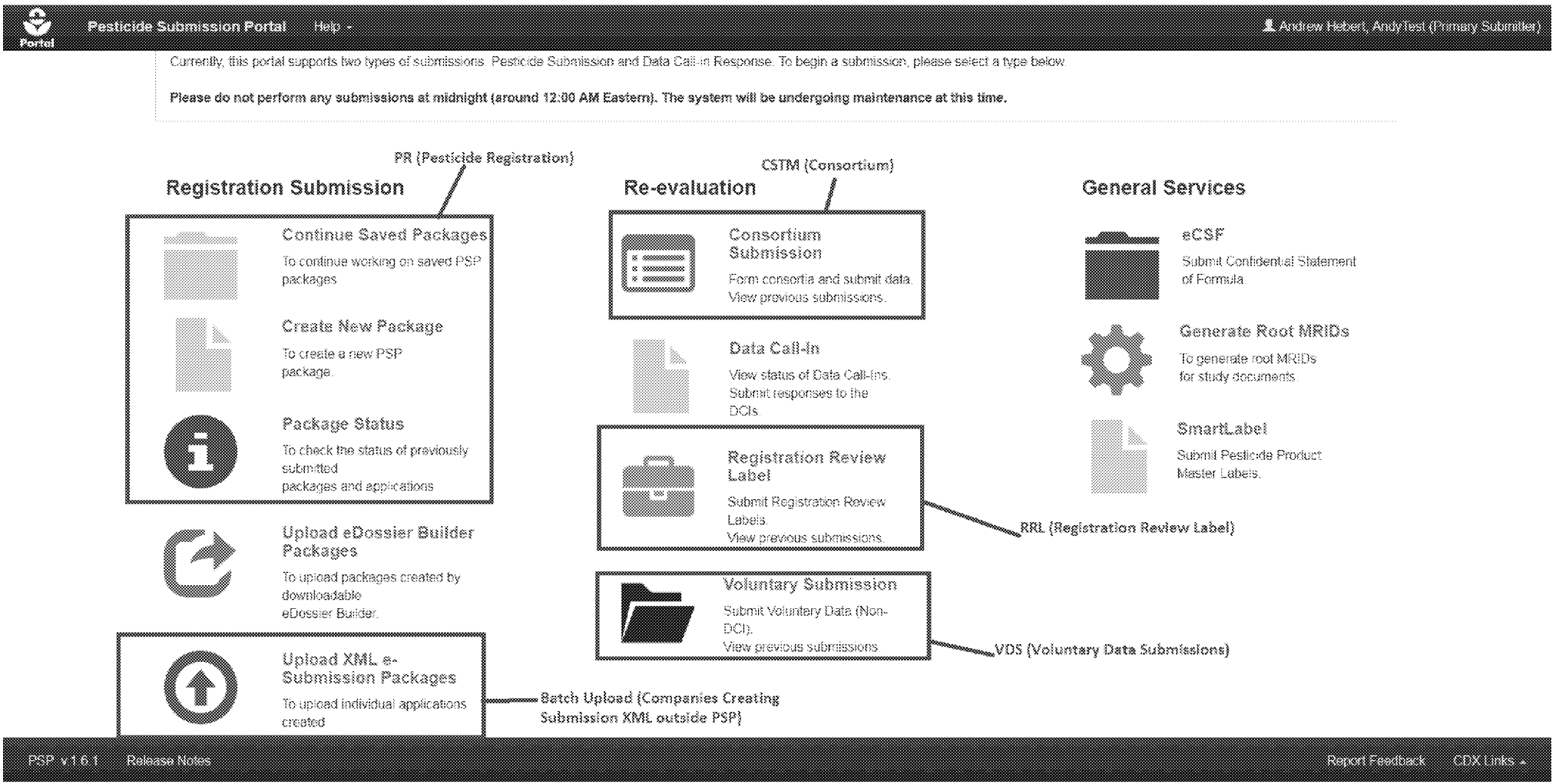
Portal
Pesticide Submission Portal
Help
Andrew Hebert, AndyTest (Primary Submitter)
Currently, this portal supports two types of submissions: Pesticide Submission and Data Call-in Response. To begin a submission, please select a type below.
Please do not perform any submissions at midnight (around 12:00 AM Eastern). The system will be undergoing maintenance at this time.
PR (Pesticide Registration)
Registration Submission
Continue Saved Packages
To continue working on saved PSP packages.
Create New Package
To create a new PSP package.
Package Status
To check the status of previously submitted packages and applications.
Upload eDossier Builder Packages
To upload packages created by downloadable eDossier Builder.
Upload XML e-Submission Packages
To upload individual applications created
Batch Upload (Companies Creating Submission XML outside PSP)
CSTM (Consortium)
Re-evaluation
Consortium Submission
Form consortia and submit data. View previous submissions.
Data Call-In
View status of Data Call-Ins. Submit responses to the DCIs.
Registration Review Label
Submit Registration Review Labels. View previous submissions.
RRL (Registration Review Label)
Voluntary Submission
Submit Voluntary Data (Non-DCI). View previous submissions.
VDS (Voluntary Data Submissions)
General Services
eCSF
Submit Confidential Statement of Formula
Generate Root MRIDs
To generate root MRIDs for study documents
SmartLabel
Submit Pesticide Product Master Labels.
PSP v 1.6.1
Release Notes
Report Feedback
CDX Links

Message

From: Mannix, Marianne [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=962A1F78B5B444CC93D3654A16A9329E-MANNIX, MARIANNE]
Sent: 5/9/2019 3:35:11 PM
To: 'Dixon Monty USGR' [monty.dixon@syngenta.com]
Subject: RE: Study Reference

Hi Monty,

Looking forward to our discussion this afternoon. Thanks for sending these MRIDs, but I wanted to let you know that I haven't been able to access them yet/read them before our meeting (sometimes we have to request pre-1996 MRIDs since they are not yet digitally loaded into our database).

I also wanted to give you a heads up that there are a few issues related to the paraquat training we'd like to discuss after the emetic discussion.

Talk soon,
Marianne

Marianne A. Mannix
Office of Pesticide Programs
U.S. Environmental Protection Agency
(703) 347-0275

From: Dixon Monty USGR <monty.dixon@syngenta.com>
Sent: Tuesday, May 07, 2019 3:56 PM
To: Mannix, Marianne <Mannix.Marianne@epa.gov>
Subject: Study Reference

Hi Marianne,

John and I look forward to meeting with you and Reuben on Thursday. I wanted to provide you the reference information for the study that I discussed with you recently. I have attached the NPIS MRID reference for the study....it is the yellow highlighted reference (MRID 00113689). You will find a second reference (MRID 00082264) as well to an earlier submitted study referenced in the highlighted study that was received concurrently by the Agency.

With Best Regards,
Monty

Montague (Monty) Dixon
Telephone: 336.632.7055
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